

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PATSY WIDAKUSWARA, *et al.*,

Plaintiffs,

- v -

KARI LAKE, *et al.*,

Defendants.

No. 25 Civ. 2390 (JPO)

DECLARATION OF CRYSTAL THOMAS

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

1. I have been the Director of Human Resources for the U.S. Agency for Global Media (“USAGM”) since 2024. I base this declaration on knowledge and information I have gained in the course of performing my official duties.

2. In that capacity, I have personal knowledge of, and direct involvement, in personnel decisions for USAGM.

3. USAGM currently employs a total of approximately 1,147 full-time employees. As of March 14, 2025, USAGM had active employment contracts with 598 personal service contractors.

4. Nearly all of USAGM’s workforce has been located in the Washington, D.C. area. Specifically, USAGM currently has approximately 1,040 full time federal employees with duty stations in the Washington, D.C. area. In addition, as of March 14, 2025, USAGM contracted with approximately 475 personal services contractors in the Washington, D.C. area. In contrast, as of the same date, USAGM employed only 14 full-time federal employees and contracted with only 25 personal services contractors in the New York City area.

5. On March 14, 2025, President Trump issued an Executive Order directing that “the non-statutory components and functions of [USAGM] shall be eliminated to the maximum extent consistent with applicable law, and such entities shall reduce the performance of their statutory functions and associated personnel to the minimum presence and function required by law” (the “Executive Order”). See Continuing the Reduction of the Federal Bureaucracy, <https://www.whitehouse.gov/presidential-actions/2025/03/continuing-the-reduction-of-the-federal-bureaucracy/> (Mar. 14, 2025).

6. On March 15, 2025, pursuant to the Executive Order, USAGM placed 1,042 full-time employees on administrative leave with full pay and benefits. On March 16, 2025, and terminated the contracts with all personal services contractors, who will be paid through March 31, 2025. The agency has retained the ability to recall employees from administrative leave to work status as it seeks to implement the Executive Order.

7. In the course of that implementation, on March 25, 2025, I sent an email to 33 employees who work at Office of Cuba Broadcasting recalling them from administrative leave effective March 26, 2025. As of the end of the day on March 26, 2025, I can confirm that all employees were on work status. I have been advised that the Office of Cuba Broadcasting resumed radio service on March 26, 2025, and television broadcasting resumed on March 27, 2025.

8. In addition to the employees recalled from administrative leave at the Office of Cuba Broadcasting, the agency has recalled approximately 31 other employees from administrative leave.

9. The American Federal Government Employees Local 1812 (“AFGE”) serves as the exclusive representative for a bargaining unit consisting of approximately 713 USAGM employees. On March 25, 2025, I sent an email to the AFGE Local 1812 President enclosing a preliminary

notification to the union stating USAGM's intent to implement a reduction in force ("RIF") for multiple competitive areas in USAGM in furtherance of the Executive Order.

10. The American Federation of State, County and Municipal Employees Local 1418, AFL-CIO ("AFSCME") serves as the exclusive representative for a bargaining unit consisting of approximately 33 USAGM employees. On March 25, 2025, I sent an email to the AFSCME Local 1418 President, enclosing a preliminary notification to the union stating USAGM's intent to implement a RIF for multiple competitive areas in furtherance of the Executive Order.

11. Both of the foregoing notifications informed the respective unions of USAGM's intention to implement a RIF in a manner consistent with USAGM's Negotiated Labor Management Agreements ("NLMA") with each union.

12. The notifications that were issued will not directly result in the termination of any USAGM employee. Rather, it is a first step in the process of conducting a RIF, pursuant to the NLMAs with each respective union. Additional steps in the RIF process with both unions will include, among other things, impact and implementation bargaining to the extent requested by the unions; providing additional information to the unions, including responding to union information requests; providing the unions with retention registers; and specific notice to bargaining unit employees. Each of these steps would occur prior to removing any bargaining unit employees in the RIF implementation process.

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

Dated: March 27, 2025
Washington, District Columbia

**Crystal G
Thomas**
CRYSTAL THOMAS

Digitally signed by
Crystal G Thomas
Date: 2025.03.27
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