

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

RFE/RL, INC.,

Plaintiff,

v.

KARI LAKE, in her official capacity, *et al.*,

Defendants.

No. 25-cv-00799-RCL

**NOTICE OF DISBURSEMENT INITIATION BY DEFENDANTS**

Defendants hereby provide notice that United States Agency for Global Media (“USAGM”) has taken immediate administrative steps to initiate the disbursement of an amount totaling \$7,464,559 to Plaintiff RFE/RL, Inc.—the amount sought in Plaintiff’s Motion for Temporary Restraining Order (“TRO”) for work completed during the period from March 1, 2025, through March 14, 2025. A record of such steps is attached to this notice as Exhibit A. Defendants will be prepared to discuss whether this obviates any irreparable harm claimed in Plaintiff’s TRO Motion at today’s TRO hearing.

Dated: March 24, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General

ERIC J. HAMILTON  
Deputy Assistant Attorney General  
Civil Division, Federal Programs Branch

JOSEPH E. BORSON  
Assistant Branch Director  
Federal Programs Branch

*/s/ Julia A. Heiman* \_\_\_\_\_  
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# **EXHIBIT A**



U.S. AGENCY FOR  
GLOBAL MEDIA

330 Independence Avenue SW | Washington, DC 20237 | usagm.gov

March 24, 2025

From Chief Financial Officer, Roman Napoli

The agency has taken immediate administrative steps to initiate the disbursement of an amount totaling \$7,464,559. Given the mechanics of the Treasury process, we believe that the payment will be in their system by March 26, 2025. We expect to provide Proof of Payment by March 26, 2025. Actual disbursement to Radio Free Europe/Radio Liberty will occur within a week from today's date.

Sincerely,

Roman Napoli  
Chief Financial Officer

