IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, *et al.*, *Plaintiffs,* –v.– KARI LAKE *et al.*, *Defendants.*	Case No. 25-cv-1015-RCL
MICHAEL ABRAMOWITZ *et al.*, *Plaintiffs,* –v.– KARI LAKE *et al.*, *Defendants.*	Case No. 25-cv-00887-RCL

NOTICE

Pursuant to the Court's Order entered on September 17, 2025, *see* ECF 91, *Abramowitz v. Lake*, No. 25-cv-00887—which ordered that the deposition of Ms. Lake be filed on the public docket—Defendants respectfully submit the deposition of Ms. Lake, which is attached as Exhibit A.

Dated: September 22, 2025

Respectfully submitted,

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/s/ Abigail Stout
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Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PATSY WIDAKUSWARA, et al., Plaintiffs, vs. KARI LAKE, et al., Defendants.	Case No. 25-cv-1015-RCL
MICHAEL ABRAMOWITZ, et al., Plaintiffs, vs. KARI LAKE, et al., Defendants.	Case No. 25-cv-00887-RCL

VIDEO-RECORDED DEPOSITION OF KARI LAKE

DATE: Tuesday, September 9, 2025

TIME: 10:04 a.m.

LOCATION: Zuckerman Spaeder, LLP
2100 L Street, N.W., Suite 400
Washington, D.C. 20037

REPORTED BY: Erick M. Thacker
Reporter, Notary

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ALSO PRESENT:

Anna Katherine Drake, USAGM
Brian Miller, USAGM (Via Zoom)
Ellen Hebert, Video Technician

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(*Exhibits attached to transcript.)

P R O C E E D I N G S

VIDEO TECHNICIAN: Good morning. We are going on the record at 10:04 a.m. The date today is September 9th, 2025. Please note that the microphones are sensitive and may pick up whispering and private conversations. Please mute your phones at this time. Audio and video recording will continue to take place unless all parties agree to go off the record.

This is Media Unit No. 1 of the video-recorded deposition of Kari Lake, taken by counsel for plaintiffs in the matters of Patsy Widakuswara -- apologies -- Widakuswara, et al. v Kari Lake, et al., Case No. 25-cv-1015-RCL, and Michael Abramowitz, et al. v. Kari Lake, et al., Case No. 25-cv-00887-RCL, filed in the United States District Court for the District of Columbia.

The location of the deposition is Zuckerman Spaeder, LLP, at 2100 L Street, Northwest, Washington, D.C.

My name is Ellen Hebert, representing

Veritext. I am the videographer. The court reporter is Erick Thacker.

If there are any objections to proceeding, please state them at the time of your appearance. Counsel and all present, including remotely, will now state their appearances and affiliations for the record beginning with the noticing attorney.

MS. GREENBERGER: Debbie Greenberger, Emery Celli Brinckerhoff Abady Ward & Maazel for the plaintiffs.

MR. BLUMIN: Matthew Blumin, American Federation of State, County and Municipal Employees, AFL-CIO, for plaintiffs.

MS. YEOMANS: Georgina Yeomans, American Federation of Municipal -- State, County and Municipal Employees, AFL-CIO, for the plaintiffs as well.

MR. SCHULTZ: Bill Schultz, Zuckerman Spaeder, for the Abramowitz plaintiffs.

MS. DOTZEL: Peggy Dotzel, Zuckerman Spaeder, for the Abramowitz plaintiffs.

MR. BEATON: Brian Beaton, Zuckerman Spaeder, for the Abramowitz plaintiffs.

MR. SEIDE: David Seide, Government Accountability Project, for the Widakuswara individual plaintiffs.

MS. LIAO: Cynthia Liao, Democracy Forward Foundation, for the plaintiffs and Widakuswara.

MR. KHOJASTEH: Sarmad Khojasteh for the United States Department of Justice for defendants.

MS. STOUT: Abigail Stout, also for defendants.

MS. DRAKE: Anna Katherine Drake, U.S. Agency for Global Media.

VIDEO TECHNICIAN: Will those attending remotely please identify themselves?

MR. CELLI: Hi, this is Andy Celli from Emery Celli for the plaintiffs.

MR. BOURLAND: Nick Bourland, also from Emery Celli, for the Widakuswara plaintiffs.

MR. MILLER: This is Brian Miller with

USAGM.

VIDEO TECHNICIAN: Thank you. The court reporter will now please swear in the witness, and then counsel may proceed.

WHEREUPON,

KARI LAKE

called as a witness, and having been first duly sworn, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFFS

BY MS. GREENBERGER

Q Good morning, Ms. Lake. Have you been deposed before?

A No.

Q Okay. So let me go over some basic ground rules. Okay. If -- while there's a videographer here, the important thing is to get your testimony on the transcript, so please answer yes or no. Don't just shake your head or nod. Okay? Just so we can --

A Okay.

Q -- have a clean record. And for that same reason, I'd ask that you let me finish my

question before answering, even if, in normal parlance, you know where I'm going and you are prepared to answer.

Is that okay?

A Yeah.

Q Great. If I -- if you need to take a break at any time, you can do so, but I would ask that you answer any question that's pending before you take a break.

A Okay.

Q You may hear your -- you're being represented by counsel today, correct?

A Yes.

Q And you may hear your counsel objecting. Unless your counsel specifically directs you not to answer, the objection is simply for the record, and you should answer the question. Okay?

If you don't understand any of my questions, please let me know. If you answer my question, I'll assume that you understood it. Is that fair?

A Yes.

Q Okay. And you understand that you're here today for a deposition in Widakuswara versus Lake and Abramowitz versus Lake?

A Uh-huh. Yes.

Q And your deposition was ordered by the Court?

A Yes.

Q And what do you understand those lawsuits to be about?

MR. KHOJASTEH: Object to form.

And I'm going to instruct the witness not to answer to the extent that doing so would reveal attorney-client communications. Of course, you can give your generalized knowledge of the lawsuits independent from anything your lawyers have told you about the cases.

THE WITNESS: These lawsuits are employees, a couple of employees from the agency, from VOA, an outlet at the agency, who are suing, I'm guessing to get their jobs back.

BY MS. GREENBERGER

Q And what do you understand you're here today to testify about?

A What do I understand what?

Q You're here today to testify about.

MS. GREENBERGER: And I assume you have the same objection.

MR. KHOJASTEH: Same objection.

MS. GREENBERGER: Same instruction.

MR. KHOJASTEH: To the extent that -- to the extent that -- you can answer the question to the extent that doing so does not reveal attorney-client communications.

THE WITNESS: I think we're here to answer some of the questions, some of the same questions that perhaps have been asked already, and maybe to give more information about the questions that have already been asked.

BY MS. GREENBERGER

Q You mean already been asked by the Court?

A Yes.

Q Let me start by just asking generally about your professional background. I don't think we need to spend a lot of time on this.

Before you joined USAGM, you were a TV news anchor in Phoenix for a long time?

A I was a broadcast journalist and news anchor.

Q In Phoenix?

A In Phoenix and other places --

Q Okay.

A -- for 30 years.

Q For 30 years. And you ran for governor of Arizona in 2022; is that correct?

A Yes.

Q And what was the result of that election?

A Well, I think the results were questionable, but the result is that I'm sitting here running U.S. Agency for Global Media.

Q And then you ran for senator for the Arizona seat in 2024?

A Uh-huh. Yes.

Q And what was the result of that election?

A Well, as I said, I'm sitting here at U.S. Agency for Global Media.

Q But that didn't actually answer my question. What was the result of that election?

MR. KHOJASTEH: Object to form. Asked and answered.

MS. GREENBERGER: She did not answer the question.

MR. KHOJASTEH: Object to form. Asked and answered.

BY MS. GREENBERGER

Q Okay. You can answer the question.

A The result of the election is that I'm sitting here in Washington, D.C. working for the Trump Administration.

Q So elections --

A I'm wondering what your question is. What do you mean, the result of the election?

Q Let me ask it another way. Did you win or lose the -- your race for Senate in 2024?

A The -- the Senate race was confirmed for Ruben Gallego.

Q Why did --

A It was certified. Pardon me. Certified.

Q Why did you want to work in the new administration at USAGM?

A Because I believe in the America First agenda of President Donald J. Trump.

Q And specifically as to USAGM, what do you hope to accomplish in your role?

A Can you expound on that?

Q I'll ask it -- I'll come back to that.

So, during the course of this litigation, you filed two sworn declarations with the Court so far?

A Yes.

Q Okay. So let me hand you those. One was on July 18th and another on August 13th?

A I'm assuming, yeah. I don't have the exact date.

MS. GREENBERGER: Okay. So I will hand

you -- Exhibit 1 is your August 13th declaration.

(Deposition Exhibit Number 1 was marked for identification.)

THE WITNESS: Okay.

MS. GREENBERGER: And I will hand you Exhibit 2. These have been premarked.

THE WITNESS: You know what? I forgot my reading glasses. Is there a way someone could grab those for me?

MS. GREENBERGER: Sure. Why don't we go off the -- well, I don't know. Is there somebody who --

MR. KHOJASTEH: We can go off the record for a second if you want to just run out and get it.

THE WITNESS: I'm sorry, guys.

MS. GREENBERGER: You know what?

THE WITNESS: They're in my bag. Yeah.

MR. KHOJASTEH: We can keep going, and I won't ask you questions that you have to look down while she's getting --

THE WITNESS: Well, I would like to

have them.

MS. GREENBERGER: No, no, I mean, she should get them.

THE WITNESS: Okay. Can you just check? They're in a black lens holder.

BY MS. GREENBERGER

Q And I know you can't look at them till you get your glasses --

A I mean, I can a little bit.

Q It's okay. But just -- those declarations, you understand you signed both of them?

A Yes.

Q And I'll give you the second one. It's Exhibit 2. This is your --

A This is July?

Q -- July 18th declaration.

A Okay.

(Deposition Exhibit Number 2 was marked for identification.)

BY MS. GREENBERGER

Q And when you signed them, you

understood that they were under penalty of perjury?

A Yes.

Q And you understand that they needed to be truthful and accurate?

A Yes.

Q And do you believe that they are both truthful and accurate?

A To the best of my knowledge and ability, yes.

Q Okay.

THE WITNESS: Oh, you're so sweet. Excuse me, everyone. Thank you.

BY MS. GREENBERGER

Q Who wrote these declarations?

A I worked with my team to put the information together in these declarations.

Q And so let's start at the July 18th declaration. Who's the team that you worked with to prepare that declaration?

A Just a variety. I mean, if there were questions about number of staffing, I'd work with

people in HR to make sure that we had the right staffing. You'll see this is changing, so I wanted to make sure we had the accurate information as of the date that it was filed.

Q And so who in HR did you work with for the July 18th declaration?

A I don't recall.

Q Other than somebody in H- -- and same question for the August 13th declaration. Did you work with someone in HR?

A I worked with my team, and if we had questions about numbers of staffing, numbers of individuals, then that would be -- involve a question to HR, and somebody on my team would reach out to HR to get accurate numbers.

Q Do you recall the names of any specific people on your team that you worked with for either declaration?

A A variety of people. I worked with Frank Wuco, John Zadrozny and -- and my legal team.

Q I won't ask any questions about your

legal team.

But other than Wuco and Zadrozny, do you recall any other people on your team that you worked with for either declaration?

A Well, other people were most likely contacted, but may have been contacted by other people who were helping me put this together.

Q Right. And I'm only asking today for this question and generally about your personal knowledge. Okay?

Did you work with Mr. Wuco for both declarations?

A I think he worked a lot on the first one.

Q And how about Mr. Zadrozny?

A I think they both worked a little bit in helping me put these together.

Q For both declarations?

A Yeah.

Q Okay. And did you review them before you signed and filed them?

A Yes.

Q Okay. So let's -- why don't you put Exhibit 1 in front of you. You can put Exhibit 2 at the side right now.

A So the later one?

Q The later one, yeah.

MR. KHOJASTEH: We're starting with August 13th?

MS. GREENBERGER: Correct.

MR. KHOJASTEH: Okay.

MS. GREENBERGER: We're going to come back to the other one.

MR. KHOJASTEH: Yeah, sure.

BY MS. GREENBERGER

Q So paragraph 33 states that "as his politically" -- I'll let you get there. I'm sorry.

A Yes, please do.

Q "As his politically appointed representative to run USAGM, I intend to help him do so within the bounds of current future and federal law."

Did you see that?

A May I read this real quick?
Q Of course.
A You're just talking about --
Q Just paragraph 33.
A -- 33? Okay.
Q Is it fair to say that from day 1 at USAGM, your role has been to serve as President Trump politically appointed representative to run USAGM?
MR. KHOJASTEH: Object to form. Lacks foundation.
BY MS. GREENBERGER
Q You can answer.
A I mean, I am the first and -- I was the first political appointee for the agency, and so I don't know what that means, if that answers your question.
Q Was your role to run the agency when you first joined it?
A I came in as a senior advisor.
Q As a senior advisor, were you running the agency?

A No.
Q Okay. We'll come back to that.
So, as your political -- as the political appointee, where -- since March 3rd, where is your office?
A I have -- I have an office over at USAGM, and I have an office at the State Department.
Q And when did you get an office at USAGM?
A When I first got there. I mean, there's -- it's a very vast building with a lot of space, but I primarily use the office at the State Department.
Q How often do you come into the office at USAGM?
A Occasionally.
Q If you were to estimate, what would that mean?
A I can't even estimate. Some weeks I'm there more than others.
Q Paragraph 1 of that exhibit, you state

that you've been serving in a role of senior advisor at USAGM since on or around March 3rd, 2025; is that correct?

A Of which one? Two? Exhibit 2?

MR. KHOJASTEH: Exhibit 1.

BY MS. GREENBERGER

Q Exhibit 1. We're sticking with Exhibit 1.

A Okay. Yes.

Q Now, the President appointed you to that position?

A Yes.

Q And before President Trump's inauguration, you were announced as the future director of VOA; is that correct?

A Correct.

Q And, ultimately, you recognized that you would have needed approval from a bipartisan board to become the director?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q You can answer.

A Will you repeat the question?

Q Sure. Did you -- so I think you already just said that you were -- that Trump had announced you as the future director --

A Uh-huh.

Q -- correct?

A Yes.

Q It's -- it's normal. It's just how people talk. Depositions are different.

And then, ultimately, when you joined in March, you did not join as director, correct?

A Correct.

Q And why is that?

A It was going to take some time, and I wanted to be sure that I was helping at the agency in any way that I could, helping in the Administration.

Q Why was it going to take some time to become director?

A I think the backlog and getting

confirmations and such.

Q And you understood that you -- to become director, you needed approval from a board, correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: That's what I've been told.

BY MS. GREENBERGER

Q And you made public statements to that effect, correct?

A Yes.

Q Okay. And, ultimately, the President fired the members of that board, so it lacked a quorum, correct?

A You'd have to ask the President that.

Q Well, it was -- it happened publicly. Did you see that happen? Are you aware of that?

A He publicly fired them?

Q We can move on.

So, when you became senior advisor of USAGM, were you an advisor to anyone specific?

A Senior advisor advising the CEO, acting CEO at the time.

Q And who was that?

A And -- and, frankly, others in management.

Q So you -- so the question was, were you an advisor to anyone specific, and it sounds like the answer is no. You were advisor to multiple people in management?

A I was an advisor to acting CEO.

Q And who was that at the time?

A Victor Morales.

Q But you also advised other people in management? You were also the senior advisor to other people in management?

A I guess, yeah.

Q Okay. How did you learn you would be appointed as senior advisor?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: What do you mean, how did I learn?

BY MS. GREENBERGER

Q Well, did you appoint yourself as senior advisor to -- to --

A No.

MR. KHOJASTEH: Well, object to form. That's -- we don't need the -- she of course knows that she didn't appoint herself. Just ask the question -- a better question.

THE WITNESS: What specifically are you --

MR. KHOJASTEH: Just ask her --

MS. GREENBERGER: I'd appreciate --

MR. KHOJASTEH: -- a question.

MS. GREENBERGER: -- no speaking objections. If you have an objection, you can --

MR. KHOJASTEH: Just be --

MS. GREENBERGER: -- note it.

MR. KHOJASTEH: -- polite.

MS. GREENBERGER: I've been being polite.

MR. KHOJASTEH: I know. That's why I objected this time, because that was the one --

first time you haven't been polite. Fair?
BY MS. GREENBERGER
Q So the question was: How did you learn that you would be appointed to senior advisor?
A I got word from The White House.
Q And when did you get word from The White House?
A I think it was maybe -- I'm guessing. Maybe February, January, sometime in January or February. I mean, that is truly a guess. I don't -- I don't remember.
Q And what documents reflect your appointment as senior advisor?
MR. KHOJASTEH: Object to form.
THE WITNESS: I don't remember if it was an e-mail or how they officially told HR that.
BY MS. GREENBERGER
Q Are there any documents that you know of that reflect that appointment?
A I'm sure there's something, because I didn't just walk in.

Q But you don't know what the document is?

A I -- at this moment, I don't recall what the document is. However, PPO makes those announcements to an agency.

Q Now, as senior advisor, who did you report to?

A The President. The White --

Q Directly?

A -- House. Pardon?

Q Directly?

A The White House, the Administration.

Q Was there anyone you reported to between you and the President?

A I mean, I guess PPO.

Q And what is PPO?

A Presidential Personnel Office.

Q Are there any documents that reflect who you reported to?

MR. KHOJASTEH: Object to form.

THE WITNESS: I think reporting to -- I guess I need you to define that, because I'm

thinking who is my contact, and that's PPO. But reporting to as a part of -- I guess what does reporting to mean in your --

BY MS. GREENBERGER

Q Who -- let me ask it a different way. Is it fair to say the President gave you direction?

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q -- on how to do your job?

MR. KHOJASTEH: Object to form.

You can answer the question yes or no. However, any substance as to the communications between you and the President, we're going to invoke executive privilege. But you can answer the question yes or no as to whether you communicated with the President regarding the -- your role at the agency.

THE WITNESS: Yeah. Could you repeat the question, then?

BY MS. GREENBERGER

Q Sure. Did the President direct your

duties as -- in your role at USAGM as senior advisor?

A What do you mean by direct my duties?

Q Did the President direct you on what to do?

A No.

Q Did you report to the President as to what you would be doing; yes or no?

I'm not asking for the substance at the moment.

A I think no. I mean, no.

Q Was there anybody that you were reporting to that was your boss? Let's ask it that way.

A Well, I consider the President of the United States my boss.

Q And do you consider anyone else other than the President your boss?

A No.

Q Okay.

A God.

Q Fair enough. Does USAGM have an order

of succession?

MR. KHOJASTEH: Object to form.

THE WITNESS: I'm not sure. I think there may be one that might be outdated. I'm not sure.

BY MS. GREENBERGER

Q Do you know if the order of succession has the senior advisor in the order somewhere?

A I'm not sure.

Q So I'm going to ask some questions to understand how you fit as senior advisor in the organizational chart at USAGM.

So, first of all, was there an organizational chart that included senior advisor?

A I don't know.

Q Have you ever seen an organizational chart of the agency?

A Yeah.

Q And is senior advisor on that organizational chart?

A I don't know.

Q When did you see that organizational chart?

A I think I've seen it, you know, throughout my time there, maybe on website or --

Q Okay. And who reported to you as senior advisor?

MR. KHOJASTEH: Object to form. Do you want to narrow a time frame?

MS. GREENBERGER: Sure.

MR. KHOJASTEH: Just -- I'm just helping you. I'm just --

BY MS. GREENBERGER

Q We can start with March 2025 --

A Okay.

Q -- if that is helpful.

A Yeah.

Q So you started as senior advisor --

A Right.

Q -- on March -- on March 3rd --

A Right.

Q -- correct?

A Uh-huh.

Q Yes --
A Yes.
Q -- or no?
And who reported to you in March 2025 as senior advisor?
A Well, I advise -- my -- my role was to advise the CEO, the acting CEO. So he would be the boss.
Q Who was the acting CEO -- you just referred to the acting CEO. So who are you referring to?
A I think I've already answered that.
Q Okay. Well, answer it again.
A Victor Morales.
Q Okay. Now, you announced Victor Morales joining the agency; is that correct? I'm sorry, not joining the agency. Becoming acting CEO, correct?
MR. KHOJASTEH: Object to form. Lacks foundation.
THE WITNESS: I -- I don't recall. I mean, I may have. It may have come out of HR.

BY MS. GREENBERGER

Q Does the role of senior advisor have a position description?

A Yes.

Q And that's a document describing your duties and responsibilities as senior advisor?

A Yes.

Q And who prepared that document?

A I'm not sure if it was PPO or another agency, OPM.

Q And what were the job duties that you understood senior advisor -- what were the job duties of senior advisor as you understood them?

MR. KHOJASTEH: I'm going to object to form. Just to the extent that you can answer the question without disclosing any communications you've had with counsel regarding this issue, you can. If you have independent thoughts separate and apart from what you've talked to counsel about on these issues, you can, of course, talk -- answer the question.

THE WITNESS: You know, there's a lot

of different descriptions that -- you know, duties, so I can't remember all of them.

BY MS. GREENBERGER

Q Okay. Well, just tell me what you do remember. What are the job duties you can recall as senior advisor?

A To help make sure that the President's agenda is being followed and advise the team. How's that?

Q Anything else?

A No.

Q So some might say those are goals, not duties or obligations. Is there any obligations or specific duties that, as senior advisor, you were required to perform?

MR. KHOJASTEH: Object to form. Asked and answered.

BY MS. GREENBERGER

Q You can answer.

A Without having the PD in front of me, I'd rather not speculate.

Q So you can't recall any specific

duties; is that your testimony?

A Well, I'm under oath, and I'd rather not speculate.

Q I don't want you to speculate, so we're on the same page. So the question I just had is what you recall, and if your answer is you don't recall any, that's your answer.

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q I'm just trying to understand your answer.

MR. KHOJASTEH: Object to form. Mischaracterizes the testimony. Also asked and answered.

THE WITNESS: I think I answered that.

BY MS. GREENBERGER

Q Do you recall any job duties other than making sure the agenda of the President is followed and advising the team?

A And advising the acting CEO.

VIDEO TECHNICIAN: Apologies, Counsel. Could I ask you to brush your hair back a bit?

It's rubbing against the mic.

And, Ms. Lake, could I ask you to move to your left a little bit?

THE WITNESS: Move to my left?

VIDEO TECHNICIAN: Yes.

THE WITNESS: This way?

VIDEO TECHNICIAN: Yes. Thank you very much.

BY MS. GREENBERGER

Q Now, did the title of senior advisor exist at the agency before you joined the agency?

A I don't know. I think it's a common -- it's a common job in an Administration.

Q Did you replace someone as senior advisor --

A I don't know.

Q -- at USAGM?

A I don't know if they had somebody in that position.

Q Did anyone hold the position of senior advisor at USAGM at the same time as you did?

A I think we brought in John Zadrozny as

senior advisor.

Q And when did you bring in John Zadrozny?

A That I don't know. I don't have an exact date.

Q Can you estimate?

A I want to say -- I mean, this is a guess. I might be completely wrong. May or June.

Q And when you say we brought in John -- John Zadrozny, who's the we?

A The White House. And Mora Namdar held it before him.

Q Mora Namdar held what? I'm sorry.

A Senior advisor.

Q And when did Mora Namdar join the agency as --

A I believe it was --

Q -- senior advisor?

A -- sometime in March.

Q And then did Mora Namdar leave the agency or --

A Yes.
Q When did she leave the agency?
A I don't have the dates in front of me. I -- well, if you want me to guess --
Q I don't want you to guess.
A Okay.
Q Thank you, though.
A She left before John started.
Q That's helpful. Thank you.
And so you and Ms. Namdar were senior advisors at the same time?
A I believe that was her job title.
Q And was there a hierarchy between you and Ms. Namdar?
MR. KHOJASTEH: Object to form. Lacks foundation.
THE WITNESS: I -- I think because I maybe had a different PD than she did, possibly. I don't know.
BY MS. GREENBERGER
Q Can you explain why you -- what you mean by that?

A I don't know if our -- if our position descriptions were exactly the same. I would have to look at both of them next to each other and see.

Q Do you think you had a similar role in terms of one being more or less powerful within the agency?

A You know what? I actually don't even know if she had the same job description, so I don't want to answer that unless I know for sure.

Right now we're assuming that we had the exact same job description. I don't recall what her job description was, if it was senior advisor. I -- that was a guess, and I want to make sure that we did have the same job description before I continue answering questions on that.

Q John Zadrozny, was he senior advisor at the same time that you were senior advisor?

A Yeah. I think we did overlap.

Q And between the two of you, who had more power at the agency?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I like to think I am kind of a team player, and I lean on a lot of people.

BY MS. GREENBERGER

Q Do you ever have disputes within the agency?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Not really. I mean, disputes, what do you -- define dispute.

BY MS. GREENBERGER

Q Let me ask it a different way.

A A fight?

Q I'm not envisioning fisticuffs, if that's what you mean. Let me ask it a different way.

Between you and John, is your testimony that you were at the same level within the hierarchy at USAGM?

MR. KHOJASTEH: Object to form.

THE WITNESS: I think in --

MR. KHOJASTEH: Lacks foundation.

THE WITNESS: I think in the federal government, we were both SESs. So that's kind of an equal level. Mora came in as GS-15 and then moved to SES.

BY MS. GREENBERGER

Q How did you divide responsibilities between you and John Zadrozny when you were both senior advisors?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: How did -- pardon me? How did we?

BY MS. GREENBERGER

Q So there was a time that you and John Zadrozny were both senior advisors, correct?

A Uh-huh. Yes.

Q And so, speaking of that time period, what were the responsibilities that fell into your camp and the responsibilities that fell into Mr. Zadrozny's camp?

MR. KHOJASTEH: Object to form. Lacks

foundation.

THE WITNESS: We divide the work. There's a lot of work to be done, and we divide it.

BY MS. GREENBERGER

Q And how did you divide it?

A It just depends on what we had to accomplish each day. And sometimes I would ask John to take on some things. He's got a background and had worked with legislative affairs before, leaning on his strengths and some things I -- I did.

Q So you would decide which tasks would stay on your plate and which would go to John's plate. Is that fair to say?

A Yeah. We both would.

Q Is Brian Miller also a senior advisor?

I'm sorry. Before I get to that, is John Zadrozny still a senior advisor today?

A Yes.

Q Okay. And is Brian Miller also a senior advisor at the agency?

A I think Brian Miller just got a new description, senior -- I'm trying to remember -- counsel. Senior counsel.

Q Was he senior advisor at some point?

A Yes.

Q And when -- from when to when was Brian Miller senior counsel?

A When he started.

Q I'm sorry. Let me repeat the question. I'll take that back.

From when to when was Brian Miller senior advisor?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Oh, when he started, and I don't recall the date, you know, roughly, maybe sometime in July or August until recently.

BY MS. GREENBERGER

Q When you say recently, the defendants filed a notice on August 28th saying that Mr. Miller was senior advisor.

A Yes.

Q So this is something that is --
A This is something probably in the last few days.
Q And why did Mr. Miller stop being senior advisor in the last few days?
A I wanted him to be on our general counsel team. That's where I wanted him to be.
Q Now, when Mr. Zadrozny was appointed by the White House to be senior advisor, was there documentation to that effect?
MR. KHOJASTEH: Object to form. Lacks foundation.
THE WITNESS: I think the HR team put together documentation along with PPO, The White House.
BY MS. GREENBERGER
Q Same question for Mr. Miller.
Well, first of all, was he also appointed by the White House as senior advisor?
A Yes.
Q And same question about documentation. Is there, you believe, documentation from the HR

team and PPO about Mr. Miller's appointment as senior advisor?

A We don't let people just roam off the street. We have to go through the proper channels, yes.

Q Mr. Wuco, has he ever been senior advisor?

A I think we're just making him senior advisor right now.

Q And when do you -- is that effective already or effective in the past?

A I have been caught up in this, so I haven't checked.

Q But sometime either -- just this week, he's going to be senior advisor?

A This week or last week, yeah.

Q Okay. And what was his title before senior advisor?

A He was a part-time -- I want to say -- is it SGE? Is that the appropriate term? Kind of a part-time consultant.

Q And when did Mr. Wuco start being a

part-time consultant for the agency?

MR. KHOJASTEH: Object to form.

THE WITNESS: I don't --

MR. KHOJASTEH: Lacks foundation.

THE WITNESS: -- recall. I don't recall.

MS. GREENBERGER: And --

THE WITNESS: Late spring, early summer.

BY MS. GREENBERGER

Q And who made him the part-time consultant for the agency?

A PPO, The White House.

Q The White House appointed him to be a part-time consultant for the agency in the late spring; is that correct?

A I would need to go look and get the exact date for you, but I -- that's my best guess.

Q Right. So, going back to the 8/13 declaration, which I think is Exhibit 1, in paragraph 1 -- you don't even really need to look

because -- it says, I subsequently assumed the role of Deputy CEO.

Is that correct?

A Deputy Chief Executive Officer, yeah.

Q And when did you become deputy CEO?

A I believe that was the beginning of July.

Q And how did you become deputy CEO?

A The White House appointed me.

Q And how were you notified that The White House was appointing you as deputy CEO?

A By e-mail.

Q And are you aware of any documentation other than that e-mail about your appointment as deputy CEO?

A I mean, the same protocol that happens when PPO brings somebody in. It starts with an e-mail and then HR documentation.

Q And did you talk to anyone in the Trump Administration about your appointment to deputy CEO?

MR. KHOJASTEH: Object to form. It's a

yes or no question. You can answer it. However, any substance regarding your communications with the President, we're going to be claiming executive privilege over the substance, but you can answer the question yes or no.

THE WITNESS: Yes.

BY MS. GREENBERGER

Q And other than the President -- well, let me start there. Did you have communications, yes or no, with the President about being appointed deputy CEO?

A No.

Q Who did you speak to in the Administration about becoming deputy CEO?

A PPO.

Q PPO are bureaucrats, correct?

MR. KHOJASTEH: Objection to form.

THE WITNESS: They're appointees by the President.

BY MS. GREENBERGER

Q Did you speak to Mr. Miller about becoming deputy CEO?

A No.
Q Did you speak to Secretary Rubio?
A No.
Q Can you let me know who specifically you spoke to about becoming deputy CEO?
MR. KHOJASTEH: Object to form. Asked and answered.
THE WITNESS: I don't recall exactly who.
BY MS. GREENBERGER
Q Was there any sort of hiring or interview process before you became a deputy CEO?
A No.
Q Did you express interest in the role before you were appointed?
A Yes.
Q And who did you express interest to?
A White House and PPO.
Q Who in The White House or PPO?
A The head of PPO.
Q And who is that?
A Sergio Gor.

MS. GREENBERGER: And just getting back to the date -- can I have tab 11? And I don't know that I'll need to show this to you, but --

MR. BLUMIN: I already distributed it.

MS. GREENBERGER: Oh, I'm sorry. That's Exhibit 2. So Exhibit 2 -- hang on one second. Give me a second.

BY MS. GREENBERGER

Q Exhibit 2, which is filed on July 18th, in that exhibit, paragraph 1, you state that you have been serving in the role of senior advisor, correct?

A Correct.

Q So does this refresh your recollection that as of July 18th, you were senior advisor and not yet deputy CEO?

A I was senior advisor with the delegated authorities of the CEO.

Q Okay. So by July 17 -- I'm sorry. By July -- I'll retract that.

By July 18th, you were senior advisor and deputy CEO?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony.

THE WITNESS: Since March, I had delegated authorities of the CEO granted to me by Victor Morales.

BY MS. GREENBERGER

Q And did you have all the authorities of Mr. Morales starting in March?

A I think probably 95 percent of them.

Q And what's in the 5 percent that were not delegated to you?

A Writing reports that were due and, you know, annual reports, quarterly reports.

Q So, as senior advisor starting on March 3rd, you had the authority of the CEO; is that correct?

A Not starting March 3rd.

MR. KHOJASTEH: Object to -- object to form. Calls for a legal conclusion.

To the extent that answering the question discloses any communications you had with counsel, I'm going to instruct you not to

answer, but you can otherwise answer if you have an independent understanding of your authority as of that date.

THE WITNESS: Can you reask the question? I apologize.

BY MS. GREENBERGER

Q Sure. So, at some point in March, you were delegated what you have said is 95 percent of the CEO's authority; is that correct?

A Roughly 95 percent.

Q Roughly.

A I didn't do the math.

Q What was that point in March when you were delegated roughly 95 percent of the CEO's authority?

A I would have -- I would be making a guess. Sometime early March.

Q Was this before or after the President's EO concerning USAGM?

A It was before.

Q Okay. So that EO was March 14th, correct?

A Yes.
Q Okay. So sometime between March 3rd and March 14th, you were delegated roughly 95 percent of the CEO's authority, correct?
A Sometime between March 3rd, yes.
Q And you continued to have that delegated CEO authority through the entire time that you've served as senior advisor?
A Yes.
Q Okay. And so just going back to Exhibit 2, which we were looking at, which says that as of July 18th, you were senior advisor, were you also deputy CEO as of July 18?
A Which one of these?
Q Two.
A Two.
Q Just the first paragraph.
A Okay. The question you're asking -- is what I wrote here true, are you asking?
Q Well, I'm asking to try to understand your roles.
A Okay.

Q So when it says that you were senior advisor as of July 18th, I assume that was true, correct?

A Uh-huh.

Q Sorry. You have to say yes or no.

A Yes.

Q And were you also deputy CEO as of July 18th?

MR. KHOJASTEH: Object to form. Asked and answered. If you know.

THE WITNESS: You know what? I don't recall on this if -- when we filed this if I was. I really need to look at dates. I mean, I would be guessing.

BY MS. GREENBERGER

Q Okay. And are you still senior advisor today?

A I am deputy CEO with -- I'm acting CEO.

Q And are you also still senior advisor?

A No.

Q Okay. So when did you stop being senior advisor?

A When I became deputy CEO.

Q So this is the part I'm just trying to understand. If you were senior advisor on July 18th, could you have also been deputy CEO at that same time?

MR. KHOJASTEH: Object to form. If you know.

THE WITNESS: I don't know. I think -- I think that when I became deputy CEO, there would be maybe some overlap, but, eventually, I would just be deputy CEO.

BY MS. GREENBERGER

Q Okay. But there might have been a time of overlap where you were senior advisor and deputy CEO?

A When the paperwork was -- yeah.

Q All the paperwork was getting accomplished?

A Yeah.

Q Okay. When you -- when you fully transitioned to deputy CEO, did someone take over your role as senior advisor?

A Well, John Zadrozny --

MR. KHOJASTEH: Object to form. Lacks foundation. Go ahead.

BY MS. GREENBERGER

Q You can answer. John Zadrozny?

A Yes.

Q Okay.

A Well, no, I mean, he kept his role.

Q Well, did someone take over your role as senior advisor?

The work that you had said that you had divided responsibilities with Mr. Zadrozny, did -- did someone take over your portion of those responsibilities?

A I think we just get the job done. I don't think there's any you have to take on my responsibilities.

Q You had earlier testified that you expressed interest in being deputy CEO to Sergio -- I'm sorry. I missed his last name.

A Gor.

Q Gor. When did you express interest to

Mr. Gor in being deputy CEO?

A I think it was sometime early July.

Q And what did you tell Mr. Gor about why you wanted to be deputy CEO?

A I was concerned that our acting CEO was on a extended vacation and if that if anything were to happen to him, the agency would be left vulnerable.

Q And the acting CEO at the time was Mr. Morales?

A Yes.

Q And when you say an extended vacation, you mean a personal vacation?

A Yes.

Q And how long was he on a personal vacation?

A I think it was a month or longer.

Q And where was he?

A Somewhere -- maybe the Philippines.

Q And what was Mr. Gor's response to your expression of interest in becoming deputy CEO and the concerns you raised about Mr. Morales?

A It was a real concern and that they agreed.

Q And when you say "they," who are you referring to?

A Well, PPO. I think it's not one conversation. It becomes more than one conversation.

Q And when did you learn that you would be appointed to deputy CEO?

A Sometime in early July.

Q Now, as deputy CEO, is it fair to say you're now at the top of the organizational chart at USAGM?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Let me ask it a different way.

When you became deputy CEO, were you at the top of the USAGM organizational chart?

A The acting CEO was above.

Q And I think we -- we already discussed how functionally you had all -- I shouldn't say

all -- roughly 95 percent --

A Yeah.

Q -- of the authority of the acting CEO, correct?

A Yes.

Q Okay. So starting at some time in early March before March 14th, you had roughly 95 percent of the authority of the acting CEO all the way up till the time when you became acting CEO, correct?

MR. KHOJASTEH: Object to form. Mischaracterizes the testimony. Lacks foundation. Go ahead.

THE WITNESS: One more time.

BY MS. GREENBERGER

Q Fair enough. I just want to make sure the testimony is clear.

So from the time that we already determined was between March 3rd and March 14th that you joined the agency, you had 95 percent, roughly, of the CEO's authority until the point when you became yourself acting CEO --

MR. KHOJASTEH: Same objection.
BY MS. GREENBERGER
Q -- correct?
A Sounds right, yeah.
Q Okay. Was there a position description for deputy CEO?
A Yes.
Q And what are the duties and responsibilities of deputy CEO?
A In some ways similar to CEO. And one of the -- one of the duties is to be acting CEO in the absence of CEO.
Q And are extended vacations considered absences in your view?
MR. KHOJASTEH: Object to form.
THE WITNESS: No. I mean, I guess they're physically absent, yes.
BY MS. GREENBERGER
Q So you did -- you did have the responsibility of the acting CEO while Mr. Morales was on an extended vacation?
A Well, I --

MR. KHOJASTEH: Object to form. Mischaracterizes the testimony.

BY MS. GREENBERGER

Q You can answer.

A I had delegated authorities of CEO.

Q Did your responsibilities change when you became deputy CEO as compared to when you were senior advisor?

A I think the PD is different, yeah.

Q But from a day to day, you know, work that you were doing, did your responsibilities change?

A You know, maybe a little bit. I'm the -- I had the delegated -- the delegated authority to be the CEO.

Q Did you take on that 5 percent of responsibilities that previously had been staying on Mr. Morales's plate?

A He --

MR. KHOJASTEH: Object to form. Lacks foundation.

Can you just in your question frame

what time frame you're discussing?

MS. GREENBERGER: Sure.

BY MS. GREENBERGER

Q During the time that you were deputy CEO, did you have the responsibilities of that -- of that 5 percent that had not previously been delegated?

A Of the delegated CEO? No. Victor did not give me those -- that 5 percent --

Q Okay.

A -- did not delegate that to me.

Q Okay. And we said earlier that that 5 percent was report writing?

A And other things. I don't recall all of it.

Q Do you recall anything besides report writing?

A No, I don't recall. There's other things in there, I'm sure, but I don't recall.

Q Okay. And when you had the delegated authority from Mr. Morales, that meant that Mr. Morales didn't have to approve your decisions

as to that 95 percent, correct?

A During what --

MR. KHOJASTEH: Object --

THE WITNESS: -- time?

MR. KHOJASTEH: Go ahead. Object to form. Calls for a legal conclusion. You can -- lacks foundation.

You can answer.

BY MS. GREENBERGER

Q So starting that time period in early March, between March 3rd and March 14, while you were senior advisor before you became deputy CEO, did you understand that Mr. Morales had to approve any of your decisions?

A Yeah. I mean, I don't know if I -- if he had to approve my decisions, but I consulted with him on a lot of -- everything.

Q You consulted with him and you had the authority, correct?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. Lacks foundation.

BY MS. GREENBERGER

Q Go ahead.

A I tried to be very open with Victor and make sure that he had his eyes on things.

Q Okay. Now, starting in late July, you became acting CEO; is that correct?

A Yes.

Q And when in late July?

A I don't have the exact date.

Q Okay. And did you become late July -- I'm sorry.

Did you become acting CEO when Mr. Morales was put on leave?

A I became acting CEO earlier than that. Oh, I'm sorry. I thought you said deputy.

Q Oh, it's fine.

A Will you repeat that?

Q Of course.

A When did I become acting CEO?

Q Yeah. So my question was: Did you become acting CEO when Mr. Morales was --

A I thought you said deputy. Apologies.

Q That's fine.

A I became deputy CEO while Victor Morales was on vacation.

Q So let me go back. So your declaration, paragraph 1 of Exhibit 1, which is the 8/13 declaration, states that you became acting CEO starting in late July, correct?

A I assumed the role of acting CEO in late July, yes, that is correct.

Q Okay. And that's accurate?

A Yes.

Q Okay. And did you become acting CEO when Mr. Morales was placed on leave?

MR. KHOJASTEH: Just to be -- I think there's a confusion. You're saying placed on leave. You're not referring to his month-long vacation. You're talking about when he's placed on administrative leave, right?

MS. GREENBERGER: I'm happy to clarify.

MR. KHOJASTEH: That was -- that's why there's a disconnect here.

MS. GREENBERGER: Fair enough. I

appreciate that.
BY MS. GREENBERGER
Q So Mr. Morales was placed on administrative leave on roughly July 22nd; is that right?
A Paid administrative leave. I don't know the date.
Q And did you become acting CEO when Mr. Morales was placed on paid administrative leave?
A I was deputy CEO when he was placed on administrative leave.
Q And after he was placed on paid administrative leave, did you immediately become acting CEO?
A I think when The White House -- no. No, I don't think so, not immediately.
Q And were you the one who decided to place Mr. Morales on paid administrative leave in late July?
A In consultation with The White House, The White House placed him on administrative

leave.

Q And he remains on leave?

A He's on paid administrative leave, and he's still employed.

Q And going back to you becoming acting CEO, did you express any interest to anyone in wanting to be acting CEO?

A A deputy CEO?

Q Acting CEO.

A Acting CEO. An interest in like -- describe what you mean in interest. Like --

Q Did you tell anyone, I'd like to be acting CEO?

A No, I don't think I did.

Q Was it automatic going from deputy CEO to acting CEO, or was this -- was that another appointment?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: Answer?

MS. GREENBERGER: Please.

THE WITNESS: I -- that would be the PD

when the acting CEO is not -- or when -- yeah, when the acting CEO or the CEO is not available, the PD says that I would fill in in that position.

BY MS. GREENBERGER

Q So the PD for deputy CEO says that you will serve as acting CEO when the acting CEO is not available, correct?

A Correct.

Q Automatically?

A That's what the PD says.

Q Okay.

A If the --

Q And then --

A -- acting -- if the CEO is not there.

Q Great. And then, when Mr. Morales was placed on paid administrative leave, did you automatically become acting CEO pursuant to that PD?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I had the delegated

authorities of the CEO while I was deputy.

BY MS. GREENBERGER

Q And did you get appointed as acting CEO separate from being appointed as deputy CEO?

A This would -- I mean, I've had many conversations with my lawyers on this, and I feel that if I speak on this that it could -- it could be problematic when it comes to the privilege I have with my lawyers.

Q I don't want to impose on that privilege. Let me ask it a different way.

MR. KHOJASTEH: And I can help you if you want on that. What she's asking is as a fact, not communication with lawyers about what this meant or what that meant.

Just as a fact, was there a separate PPO -- you already said there's an e-mail that started with the --

THE WITNESS: Oh, I see.

MR. KHOJASTEH: -- to make you -- that starts this process. Was there something separate for becoming acting CEO? I believe

that's the question she --

MS. GREENBERGER: Sure. Was there --

MR. KHOJASTEH: -- where she's going with this.

BY MS. GREENBERGER

Q Was there a separate appointment process through PPO to become acting CEO?

A No.

Q And so there's no separate documentation about becoming acting CEO --

A No.

Q -- correct? Correct, meaning yes.

THE WITNESS: You said --

MR. KHOJASTEH: Can you --

THE WITNESS: -- there's no documentation --

BY MS. GREENBERGER

Q Right. Is there -- let me ask it a different way. Is there --

A I see what you're saying.

Q It's two negatives. Is there documentation for you becoming acting CEO?

A Documentation from?
Q PPO.
A No.
Q Is there documentation from The White House?
A No.
Q Is there any documentation --
MR. KHOJASTEH: Object to form.
BY MS. GREENBERGER
Q -- that you know of?
MR. KHOJASTEH: To the extent you know.
BY MS. GREENBERGER
Q Is there any documentation that you know of?
A From PPO?
Q From anyone.
A Well, who's anyone?
Q Well, it's okay. I'll move on.
A My neighbor?
Q Have you been formally nominated by the President to serve as the CEO, not the acting CEO?

A No.
Q Okay. And you've never been confirmed, correct?
A No.
Q Do you understand that Mr. Bozell was nominated to head USAGM?
A Yes.
Q And why were you not nominated?
MR. KHOJASTEH: Object to form. Calls for speculation.
BY MS. GREENBERGER
Q If you know.
A I asked the President to serve in the role at VOA.
Q To serve in what role at VOA? CEO?
A To help at VOA.
Q Did you make the decision to place Mr. Morales on paid leave?
MR. KHOJASTEH: Object to form. Asked and answered.
THE WITNESS: I answered that already.

BY MS. GREENBERGER

Q I'm sorry. Can you just repeat it?

A With the consultation with PPO, we discussed that I'd lost some confidence in Victor, and PPO made that decision.

Q And right now, as acting CEO, you're the highest decision-maker at USAGM right now?

A Yes.

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q And who do you report to as acting CEO? Do you report directly to the President?

A The President is my boss.

Q Other than the President, is there anyone from the executive branch who gives you directives or policies to carry out?

A Just the President.

Q Okay. Is there anyone you notify or consult with outside of the branch over actions you're going to take?

A What do you mean, the branch?

Q Outside the agency.

A Other agencies have an influence on our agency and other agencies in the government, for example, OPM, OMB, and other agencies.

Q Okay. I'll come back to that.

Now, as acting CEO, you ordered that Michael Abramowitz, the VOA director, be transferred and fired if he refused the transfer; is that correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: No. Can you repeat the question the way you answered it --

MS. GREENBERGER: Sure. Let me ask it --

THE WITNESS: -- or the way you --

MS. GREENBERGER: -- a different way.

THE WITNESS: -- asked it?

MR. KHOJASTEH: And, Counsel, if we're about to start another line of questioning, I just want to note that we've been going for an hour, so if -- if it's -- if there's -- I don't

want to interrupt your flow, so if it's --

MS. GREENBERGER: I think we have five or ten minutes --

MR. KHOJASTEH: Sure.

MS. GREENBERGER: -- when it will be --

MR. KHOJASTEH: Sure.

MS. GREENBERGER: -- a good time --

MR. KHOJASTEH: Sure.

MS. GREENBERGER: -- for a break.

BY MS. GREENBERGER

Q So you understand that Mr. Abramowitz received on August 1st a notice of proposal to remove, correct?

A Can I see that?

MS. GREENBERGER: Of course. Can I have tab 24, please? Thank you. The court reporter can mark it, and then you can have it.

(Deposition Exhibit Number 7 was marked for identification.)

MR. KHOJASTEH: I just want to note that -- is this -- is this properly within the scope of this deposition? Just -- I understand

there's -- there's --

MS. GREENBERGER: There's not going to be a lot of questioning, and I think that will --

MR. KHOJASTEH: Yeah. I just want to -- I'll give you like --

MS. GREENBERGER: There's not going to be --

MR. KHOJASTEH: -- some leeway, but just --

MS. GREENBERGER: -- a lot of questioning.

MR. KHOJASTEH: Let's not make this about --

THE WITNESS: I need to look this over.

MR. KHOJASTEH: -- something that's from another --

BY MS. GREENBERGER

Q Okay. But let me ask you the question that I'm going to ask --

A Okay.

Q -- just before you spend a lot of time looking it over.

My question is just going to be that on page 5, it lists you -- under "Notice of Opportunity to Respond," it lists you as the deciding official --

A Right.

Q -- and my question was just going to be -- and then I'll ask it formally once you've had your time -- but whether you were the decision-maker and this was your decision.

A That's not the question you just asked previous to this, though --

Q No. It's -- I was building up to that.

A -- about reassigning. You asked a question previous, which I answered.

Q So I'm going to ask the question. Just take the time that you need to look at the document knowing that's the question I'm going to ask, and you let me know when you're ready.

MR. KHOJASTEH: Ms. Lake, it's a separate question. You've made it clear that you didn't understand the prior question. She's asking a separate question.

THE WITNESS: Okay.

MR. KHOJASTEH: So just don't worry about it. You can --

MS. GREENBERGER: And just for the record, this is Exhibit 7, because I premarked some other documents.

THE WITNESS: What was the paragraph of the page you wanted me to --

BY MS. GREENBERGER

Q Sure. Page 5. And I'll just show you right here, under "Notice of Opportunity to Respond."

Let me know when you're ready.

A I'm ready.

Q The proposal to remove Mr. Abramowitz from his position as director was a proposal that was your decision, correct?

MR. KHOJASTEH: Object to form. Mischaracterizes the document and the testimony.

THE WITNESS: The proposal to remove him?

BY MS. GREENBERGER

Q I'm reading the first sentence. It says, "This is a notice I propose your removal from the position of director."

A This is --

MR. KHOJASTEH: Object to form. You're mischaracterizing. This was written by someone else.

THE WITNESS: Yes.

MR. KHOJASTEH: Go to the back page. It's from someone else.

MS. GREENBERGER: No, I understand that.

MR. KHOJASTEH: So the I's are not referring to her, so don't try to trick her.

MS. GREENBERGER: I was not trying to trick anyone.

MR. KHOJASTEH: Okay.

BY MS. GREENBERGER

Q Mr. Lake -- Ms. Lake, it says that you are the deciding official on page 5; is that correct?

A Correct.

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q And what were you --

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q -- the deciding official --

(Reporter clarification.)

MS. GREENBERGER: So sorry. Go ahead, please.

MR. KHOJASTEH: Object to form. Mischaracterizes the document. Go ahead.

BY MS. GREENBERGER

Q Okay. What you were the deciding official about?

A In the process of reassigning an SES, we followed all of the procedures, and in the process of doing that, this letter is part of that process and must go out, and there must be one person who sends the letter out, but that person cannot be then the decider, the deciding official. It must be two separate people

according to the procedures in removing somebody who refuses reassignment. We followed those procedures to a T.

Q After -- let me ask it a different way. If Mr. Abramowitz were removed as director, who would have stepped in as acting director of VOA?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: If -- pardon me? If he was --

BY MS. GREENBERGER

Q Let me ask it a different way.

Was there a succession plan at VOA so that if the director is removed, there is an acting director who steps in automatically?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Answer?

BY MS. GREENBERGER

Q You can answer.

A Leili Soltani serves as the director of programming, and the director of programming in

the absence of the director of VOA serves as an interim director.

Q Thank you. We spoke earlier about how you have an office at the State Department, and that's primarily where you are; is that correct?

A Occasionally.

Q Okay. And there had been reporting in The Washington Post that you would be detailed to the State Department. So were you, in fact, detailed to the State Department?

A Yes.

Q And when were you detailed to the State Department?

A I don't recall.

Q Was it before or after you joined USAGM?

A After.

Q And was it in the spring?

A I'm assuming, yeah.

Q And what's your role at the State Department?

A I'm a liaison.

Q A liaison between who and who?
A I guess the State Department and USAGM.
Q And are you still the liaison between USAGM and the State Department?
A Yes.
Q And who decided to make you the liaison between the State Department and USAGM?
A Well, I guess it would go through PPO.
Q Who informed you that you were going to be the liaison between USAGM and the State Department?
A Who informed me that that was going to be the title I had at State Department?
Q Yes.
A The White House liaison for State, Cate Dillon.
Q And what are your duties and responsibilities as the liaison between USAGM and the State Department?
A Liaising between USAGM and the State Department.
Q On what particular issues?

A A variety of issues.

Q What are some issues that you have been liaising on?

A Making sure that we are being responsible as we run USAGM and making sure that we are following local laws when it comes to our overseas folks who are working there, decommissioning some of our towers and transmission sites, et cetera.

MS. GREENBERGER: Okay. I think this is a good time for a break.

THE WITNESS: Great.

VIDEO TECHNICIAN: This marks the end of Media Unit No. 1. Going off the record, the time is 11:10 a.m.

(Recess 11:10 a.m. to 11:31 a.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 2. Going back on the record, the time is 11:31 a.m.

BY MS. GREENBERGER

Q Ms. Lake, I just want to follow-up on a couple of questions from --

A Okay.
Q -- before the break. Was there a deputy CEO before you were appointed deputy CEO?
A I don't believe so. I don't know. Maybe in the past there was one.
Q How about immediately before?
A No.
Q And during your time at the agency since March, there has not been a deputy CEO?
A Not that I'm aware of.
Q Okay. And while you were deputy CEO in July, did you ever seek approval from Mr. Morales?
A For what?
Q For any actions you took.
A While I was deputy CEO, did I seek approval for what?
Q Let me -- let me start a different way. Mr. Morales was on vacation in the Philippines, you said?
A Correct.
Q And from when to when was he on

vacation in the Philippines?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: I don't have his schedule. I think it was sometime in June through July.

BY MS. GREENBERGER

Q And he was on vacation in the Philippines while you were deputy CEO?

A During the time he was on vacation, I became deputy. Reask --

Q Sure.

A Could you --

Q Was --

A -- clarify?

Q While you were deputy CEO, was he in the Philippines that entire time, to your knowledge?

A While I was deputy?

Q Yes.

A For part of the time.

Q And did he return during part of that

time?

A Did he return --

MR. KHOJASTEH: Object to form. Lacks foundation and --

MS. GREENBERGER: Let me --

MR. KHOJASTEH: -- confusing.

MS. GREENBERGER: Let me ask it --

THE WITNESS: I don't --

MS. GREENBERGER: -- a different way.

THE WITNESS: -- get what you're asking.

BY MS. GREENBERGER

Q Okay. When Mr. Morales was on vacation, were you in communication with him?

A Yes.

Q And how did you -- excuse me -- how did you communicate with him?

A I think through maybe Teams calls and e-mail.

Q Okay. And you said that there was a period in July that you were deputy CEO before you became acting CEO?

A There was a period in July when I became deputy CEO during the month of July.

Q And during the time that you were deputy CEO, before Mr. Morales was placed on paid leave, did you ever seek his approval for any actions?

A What -- what actions?

Q Do you recall any actions that you sought his approval for?

MR. KHOJASTEH: Object to --

THE WITNESS: From what date --

MR. KHOJASTEH: -- form. Object to form. Lacks foundation.

THE WITNESS: I don't -- I mean, give me an example of what you're looking for, because he was on vacation and we had minor communication, maybe. I don't recall everything, but he was still checking in and perhaps, you know, hey, can you take a look at this document, that kind of thing.

BY MS. GREENBERGER

Q I hear you. I don't want perhaps. I'm

just asking if you recall specifically any steps you took as deputy CEO that you checked with him for his approval before you took it.

MR. KHOJASTEH: Object to form. Lacks -- lacks foundation. Asked and answered.

THE WITNESS: I don't know. I may have. I don't know what you're getting at, so I -- I may have. If you could be more clear, more direct on what you're asking.

BY MS. GREENBERGER

Q Well, as deputy CEO, you were running the agency; is that right?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. Lacks foundation.

THE WITNESS: I think we were sharing the responsibility because Victor had given me delegated authorities, which means that he has the authority as well.

BY MS. GREENBERGER

Q Was there a documentation -- a document that indicated that Mr. Morales was delegating authority to you?

A Yes.
Q And what did that document look like?
A It looks like a memo.
Q Okay. And who wrote the memo?
A I believe that may have come from our general counsel, so I wouldn't want to divulge too much of that.
Q What was the date of the memo?
A Of the memo from back in March, when he --
Q Well --
A -- first delegated his authorities?
Q So it sounds like there were multiple times when he delegated authority to you?
A He --
MR. KHOJASTEH: Object to form. Mischaracterizes testimony. Lacks foundation.
BY MS. GREENBERGER
Q Go ahead.
A I think we already established that he delegated his authorities to me back in March.
Q And you said that there was a document

that reflected that, in March, he delegated his authority to you, correct?

A Yes.

Q And is that document a memo from March from your general counsel?

A I believe so. I don't know who drafted it.

Q And other than that memo, are you aware of any other documentation reflecting that Mr. Morales delegated authority to you?

A Other than the March memo?

Q Correct.

A There was a July memo.

Q And was -- who drafted the July memo?

A GC.

Q And was the July memo issued at the time that you were senior advisor or deputy CEO --

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q -- or something else?

MR. KHOJASTEH: Object to form. If you

know.

THE WITNESS: The July memo was delegating the authorities of the CEO to me as deputy CEO.

BY MS. GREENBERGER

Q And your formal title right now, is that deputy CEO or acting CEO?

A Acting CEO.

Q I want to show you -- can you pull up tab 3, please -- the President's executive order that was issued on March 14th.

I assume you're familiar with the executive order?

A Very.

Q Did you -- and I'll show it to you in a minute, but did you play in role in drafting that executive order?

A No.

Q Did you have any conversations with The White House concerning that executive order before it was issued on March 14th?

MR. KHOJASTEH: Object to form. Asked

and answered.

And I will also say, to the extent that answering the question discloses any communications you had with the President, I'm going to -- I'm going to instruct you not to answer, as we're invoking executive privilege.

BY MS. GREENBERGER

Q You can answer.

A He instructed me not to answer.

Q Did you have any communications with anyone other than the President about the executive order prior to it being issued?

A Prior to? No. I didn't know about this executive order until the 14th, but I had seen that there were a lot of executive orders coming down.

MS. GREENBERGER: Did you -- well, let me show you the executive order. So it's Exhibit 4, if you don't mind -- it's been premarked. Have you given it to counsel?

MS. YEOMANS: Yes.

MS. GREENBERGER: Thank you so much.

(Deposition Exhibit Number 4 was marked for identification.)

MR. KHOJASTEH: This is Exhibit 4?

MS. GREENBERGER: Yes.

MR. KHOJASTEH: Okay.

MR. BLUMIN: Sorry. I just have one copy for the two of you.

MR. KHOJASTEH: We can share.

BY MS. GREENBERGER

Q The EO applies to six agencies besides USAGM, correct?

A Let me count. It looks like seven.

Q Including USAGM?

A Oh, including USAGM. Yeah.

Q Okay. And did you tell anyone that USAGM should be included in the executive order other than the President?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. Lacks foundation. And asked and answered. She already testified she didn't speak --

MS. GREENBERGER: Asked and answered is

the objection. There doesn't have to be more.

MR. KHOJASTEH: Okay. I was just trying to help you understand why I was doing it.

MS. GREENBERGER: I appreciate that.

MR. KHOJASTEH: Yeah.

THE WITNESS: I think you were insinuating about me speaking to the President without me answering that.

BY MS. GREENBERGER

Q I was trying to avoid the privilege objection.

A Okay.

Q So I'm not asking about your communications with the President. I'm asking about, other than any potential communications with the President, did you tell anyone that USAGM should be included in an executive order to -- to reduce the scope of the federal bureaucracy?

MR. KHOJASTEH: Object to form. Lacks foundation. Asked and answered.

THE WITNESS: Asked and answered.

Answer? Okay. No, I did not have -- I did not tell anybody to add them.

BY MS. GREENBERGER

Q And I think you said you didn't know about the executive order until the day it was issued, correct?

A I heard rumblings that there may be an executive order, but we didn't know if our agency or what agency could be on it.

Q And the executive order was issued on March 14th, correct?

A Yes.

Q And that's when you learned about the order, correct?

A Yeah.

Q And the very next day, you worked to implement that order, correct?

A Yeah.

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q And you submitted written testimony to

Congress, correct?

A At some point --

Q In June?

A -- yes. Yes.

Q Okay. And in that testimony, you told Congress, "I'm working with speed and precision to execute that order and have already cut the agency workforce by 85 percent."

Is that accurate?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I think at that point, yes, it was accurate.

BY MS. GREENBERGER

Q Okay. So let's talk about the actions that you took on March 15th. Okay?

A Uh-huh.

Q So, on March 15th, you decided to place nearly all USAGM staff on paid administrative leave; is that correct?

MR. KHOJASTEH: Object to form. Lacks foundation. Mischaracterizes testimony.

THE WITNESS: What was the first part of that again?

BY MS. GREENBERGER

Q Sure. On March 15th, you decided to place nearly all USAGM staff on paid administrative leave?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Yes.

BY MS. GREENBERGER

Q Okay. And I believe that was over 90 percent of the staff. Was that about right?

A I -- I don't know.

Q That's fine. And on March 15th, you decided to terminate all the personal service contractors, correct?

MR. KHOJASTEH: Object to form. Lacks foundation. Mischaracterizes testimony.

BY MS. GREENBERGER

Q You can answer.

A Yes.

Q There were about 600. Does that sound

right?

A Roughly.

Q And you tweeted on that day that staff should check their e-mail, correct?

A Correct.

Q Who did you confer with in making those decisions to place staff on leave and terminate the personal service contractors?

MR. KHOJASTEH: I'm going to object to form. I'm also going to instruct you, you can disclose the names of the individuals with whom you spoke to the -- strike that.

To the extent that these communications involved lawyers, you can disclose the names of the individuals with whom you spoke, but I'm going to instruct you not to divulge any of the substance of the communications you had with those individuals only to the extent that lawyers were involved in those communications.

THE WITNESS: Okay.

MR. KHOJASTEH: Do you understand, Ms. Lake?

THE WITNESS: I think if lawyers were involved in any part of the communication --

MR. KHOJASTEH: You don't -- you don't disclose what was said, but you can disclose who was on those communications, like -- so who participated in the meeting, but not what was said at the meeting. I'm just -- and I'm not trying to --

MS. GREENBERGER: I mean --

MR. KHOJASTEH: I'm just -- I'm just trying to --

MS. GREENBERGER: That's a -- that's a broad view of the privilege, but let me ask it a different way.

MR. KHOJASTEH: Well, I mean, we'll drill down on it, but --

MS. GREENBERGER: Well, I'm going to start --

MR. KHOJASTEH: -- that's a broad --

MS. GREENBERGER: -- just by --

MR. KHOJASTEH: Yeah.

MS. GREENBERGER: -- asking with who

before we go to --

MR. KHOJASTEH: Sure.

MS. GREENBERGER: -- why.

MR. KHOJASTEH: Just -- yeah.

BY MS. GREENBERGER

Q So I think there's no objection on the who. So who did you consult with before deciding on March 15th to place nearly all staff on paid administrative leave and terminate the personal service contractors?

A We had some staff that I had been consulting with, hearing that there were agencies that could be put on an executive order, not knowing if our agency would be on there, and trying to prepare to make sure what if, what would we do, how do we handle that.

Q So, first, who are the staff you consulted with?

A We had some people that we had -- that were detailed over from OPM. Mora, who was senior advisor. And I believe the OPM staffer had done a lot of consulting with a litany of

other people who were the senior career leaders.

Q Who was the OPM leader?

A Tarak Macheka (ph) -- Makecha.

Q And so on -- was it on March 14th or on March 15th, when you learned about the EO, you consulted with Tarak and Mora? Is that correct?

Am I understanding your testimony?

A March 14th, I learned about it at night, so I don't think I -- I may have -- may have sent -- you know, or called them and said, hey, it looks like this came down. And we decided to get busy to work the next day.

Q And what did you do the next day?

A You just listed what I did the next day.

Q In terms of deciding to place people on leave and terminate the personal service contractors, did you discuss that with Tarak and Mora on March 15th, or had you discussed that with Tarak and Mora previously?

A In terms of what?

Q Placing people on leave and terminating

the PSCs.

A I can't recall if we discussed it earlier, but in the executive order, it says right here in Section 2(a), "such entities shall reduce the performance of their statutory functions and associated personnel to the minimum presence and function required by law."

Q And so, after reading the EO, you understood that you were required to place nearly all staff on leave and terminate the PSCs?

MR. KHOJASTEH: Object to form.

THE WITNESS: We made the decision to determine what statutory minimum was, and in the process of doing that, we worked with the senior leadership at the agency to come up with what our plan would be. We placed everybody on paid leave and worked with senior leadership, career leadership, and they came up with the plan.

BY MS. GREENBERGER

Q Okay. So I'll -- I'll come back to the plan because I will have many questions on that.

But the decision that you made to

determine what the statutory minimum was, that was a decision you made on March 15th that you were going to go through a process to determine the statutory minimum; is that correct?

A Yeah.

Q Okay.

A I think that's accurate.

Q And while you were determining the statutory minimum, you placed everyone on -- all staff on -- strike that.

While you were determining the statutory minimum, you terminated all contractors and placed all staff on paid leave, correct?

A Paid administrative leave.

Q So that's correct?

A Yes.

Q Okay.

A So they -- the staff was not fired, was not terminated. They were placed on paid leave.

Q And on March 15th, you also directed that VOA cease all programming, correct?

MR. KHOJASTEH: Object to form. Lacks

foundation.

THE WITNESS: I don't remember if that was exactly that date.

BY MS. GREENBERGER

Q Shortly after March 14th --

A Yes.

Q -- you directed that VOA cease all programming, correct?

A Yes.

MR. KHOJASTEH: Same objection.

BY MS. GREENBERGER

Q Within the same -- on March 15th or within days after?

A Correct.

Q And within days after March 14th, you ordered that the VOA news services, the foreign news services, should shut down their transmitters?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague.

THE WITNESS: That sounds about right. I need to look back at all of the -- every step

that I took, that we took.
BY MS. GREENBERGER
Q And you made that decision to shut down the foreign transmitters while the agency was determining the statutory minimum, correct?
MR. KHOJASTEH: Object to --
THE WITNESS: I --
MR. KHOJASTEH: -- form.
THE WITNESS: I don't --
MR. KHOJASTEH: Same --
THE WITNESS: -- recall.
MR. KHOJASTEH: Lacks foundation.
BY MS. GREENBERGER
Q Before directing that VOA cease all programming, did you consider stakeholder interest?
A Define what you mean.
Q Sure. Did you consider the interest of audiences abroad before cease -- ordering that VOA cease all programming?
A I effectuated -- I got busy working to effectuate the President's executive order.

Q And as part of effectuating that order, you didn't think you needed or even should consider those stakeholder interests; is that --

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q -- fair to say?

MR. KHOJASTEH: Object to form. I'm going to instruct the witness not to answer to the extent that doing so will disclose agency deliberative process, meaning pre-decisional communications you have regarding decisions made, as well as attorney-client privilege, meaning communications you have with your general counsel or lawyers otherwise concerning the decision.

Go for it.

THE WITNESS: I'm going to refrain from answering that.

MS. GREENBERGER: Let's mark that for a ruling, please.

MR. KHOJASTEH: Just so I understand, what's the specific thing we're marking for a ruling?

MS. GREENBERGER: Your position is that any consideration she did or didn't give is deliberative process and we can't probe it?

MR. KHOJASTEH: Well, let's put that aside. First, to the extent those communications involved lawyers, I'm asserting attorney-client privilege.

MS. GREENBERGER: Okay. So let me stop there.

BY MS. GREENBERGER

Q Did you have any communications with lawyers concerning whether or not before you ceased VOA programming on March 15th you should consider the interests of audiences abroad or other stakeholders?

MR. KHOJASTEH: You can answer the question yes or no.

THE WITNESS: Me or the team had communication with lawyers, and I don't recall if that was something or if I want to share if that would be something that we would talk about.

BY MS. GREENBERGER

Q So I'm not interested in your communications with lawyers. Okay.

My question is: Other than potential communications with lawyers, did you consider the interests of audiences abroad before deciding to have VOA go dark --

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q -- on or about March 15th?

MR. KHOJASTEH: And you're asking whether Ms. Lake personally did or the career team that she was working with?

MS. GREENBERGER: First I'm going to ask about Ms. Lake.

MR. KHOJASTEH: Okay. Just to clarify that with the you's right now.

THE WITNESS: Yes, I did.

BY MS. GREENBERGER

Q What did you determine about the import of the impact on audiences abroad?

A I determined that I didn't want any of

the TV stations to go to what we call snow or like static or go to black and had a graphic made with music that had the VOA charter written on it so that that could play on a loop until we determined what the statutory minimum was so that we could effectuate the President of the United States executive order dated March 14th to reduce this agency to its statutory minimum.

Q And when -- from when to when did that graphic with a loop play on the TV?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: It depends. For the -- for the agencies or the outlets that were brought back up and the languages, it stopped once the languages were brought back up.

BY MS. GREENBERGER

Q And for other outlets --

A For example --

Q Go ahead.

A -- Office of Cuba Broadcasting, we brought that back up right away and, therefore,

the graphic ceased.

Q Are there outlets where that graphic is up still today?

A You know, Frank Wuco would be a better person to answer that question.

Q And how about the Persian News Network? When did that come back up?

A I don't have the --

MR. KHOJASTEH: Object to form.

THE WITNESS: I don't have the exact date right now.

BY MS. GREENBERGER

Q Roughly?

A I don't know.

Q It went dark for weeks, right?

MR. KHOJASTEH: Object to form. She already -- well, strike that. Asked and answered.

BY MS. GREENBERGER

Q Do you believe it went dark for weeks, or are you not sure?

A I'm just not sure.

Q How about the VOA website? Did you have any similar graphic with a loop to update the website?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: No.

BY MS. GREENBERGER

Q So the VOA website continued to have outdated journalism content, correct, after March 15th?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I wouldn't -- I wouldn't describe it that way, but if that's how you want to describe it.

BY MS. GREENBERGER

Q How would you describe it?

A We didn't put new content on.

Q Did -- are there any documents reflecting your decision to put a graphic with a loop instead of providing new broadcasting content?

A No.

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Are there any documents concerning your decision to not put new content on the VOA website?

MR. KHOJASTEH: Same objection.

THE WITNESS: Are there any documents what?

BY MS. GREENBERGER

Q Reflecting that decision?

A To not put new content?

Q Yeah.

A Where?

Q On the VOA website.

A I don't believe so.

Q Did you liaison with the State Department about the impact of VOA going dark on members of the Foreign Service?

MR. KHOJASTEH: Object to form. Lacks foundation. Also vague as to "you."

THE WITNESS: Could you be more specific on what you're --

MR. KHOJASTEH: And I would note that for the entire series of questions regarding what was done in response to the EO, standing objection that using -- using the term "you" is vague and lacks foundation.

Go for it.

BY MS. GREENBERGER

Q Well, let's go back given your counsel's objection.

I had asked about the interests of audience abroad, and you spoke about how you considered that interest by replacing the -- you didn't want snow, and so you replaced it with a graphic, correct?

A Yes.

Q And how did you believe that served the interest of audience abroad -- audiences abroad?

A I think until we determined what the statutory minimum, if -- if they would have tuned in to their VOA station and seen it had just gone

to black, they would think that it was gone, but with that graphic and -- and the music and the charter, it would let the audience know that this is still the station where you can tune in to VOA until we would determine what is statutorily mandated, and then we could proceed from there.

Q And with the graphic, would that provide to audiences any journalism content?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I don't -- I don't think so, but, you know, the charter is interesting, so they could read that. They know that the -- they know that the station still is the VOA station. And that's what we did.

BY MS. GREENBERGER

Q How about others in your agency, to your knowledge? Did they consider the interests of audiences abroad who relied on VOA news that weren't able to get it once you went dark --

MR. KHOJASTEH: Object to --

BY MS. GREENBERGER

Q -- once VOA went dark?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: I can't get into other people's heads, nor do I want to.

BY MS. GREENBERGER

Q To your knowledge.

A I don't know.

Q Okay.

A I'm not a therapist.

Q How about members of the Foreign Service? Did you consider the impact on members of the Foreign Service by having -- of having VOA go dark on March 15th or thereabouts?

A I considered a lot of things.

Q Are there any documents reflecting that you considered the impact on members of the Foreign Service?

MR. KHOJASTEH: Object to form. Vague as to documents. Lacks foundation.

THE WITNESS: I don't know if there

are. There may be. I don't know.
BY MS. GREENBERGER
Q To your knowledge.
A I don't know. There may be. I don't know.
Q As -- as senior advisor, you ordered the cancellation of the lease at 1875 Pennsylvania Avenue?
A Yes.
Q And that --
A With -- in consultation with the CEO, acting CEO.
MR. KHOJASTEH: Yeah. Same objection as -- on vagueness as to "you."
MS. GREENBERGER: I think we premarked 13, right?
MR. BLUMIN: Correct. That's Exhibit 6.
MS. GREENBERGER: I want to deal with your counsel's objection -- objection about the vagueness as to who.
MR. KHOJASTEH: As to you.

MS. GREENBERGER: As to you.

MR. KHOJASTEH: Just because there was a series of questions, you did this, you did that. I'm just -- yeah.

MS. GREENBERGER: Yeah. It's just one page. Here is Exhibit 6.

(Deposition Exhibit Number 6 was marked for identification.)

THE WITNESS: Whoa.

MS. GREENBERGER: I'm handing you Exhibit 6.

THE WITNESS: Can I have a magnifying glass, guys?

MS. GREENBERGER: Well, I'm actually going to start asking you about the headline. And, certainly, I was not intending to make this an ophthalmology exam. The --

MR. KHOJASTEH: This one's exhibit --

MS. GREENBERGER: Six.

MR. KHOJASTEH: Six.

BY MS. GREENBERGER

Q So, Exhibit 6, have you seen this

document before?

A I didn't know it was a document. I think this was on a website.

Q And this was on USAGM's website, correct?

A Yes, I believe so. Let me see. It looks like it. Yeah.

Q And the headline on this website is "USAGM Senior Advisor Kari Lake cancels obscenely expensive 15-year lease," correct?

A Correct.

Q And you approved this portion of the website before it was posted?

A Yes.

Q And this states that you were the one who canceled the lease, correct?

A Yes, in consultation with the team.

Q And it was ultimately your decision?

A In consultation with the team.

Q But ultimately your decision?

MR. KHOJASTEH: Asked and answered.

MS. GREENBERGER: She didn't answer.

MR. KHOJASTEH: She did.

THE WITNESS: I consulted with the team, and we decided it was the best thing to do --

MS. GREENBERGER: Okay. But that --

THE WITNESS: -- for the American taxpayer in light of the presidential executive order, which asked for us to reduce elements of the federal bureaucracy that the President has determined are unnecessary.

BY MS. GREENBERGER

Q But, Ms. Lake, you're not claiming that someone else made the decision to cancel the lease. You've repeatedly taken credit for canceling the lease, right?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I'll take credit for it. I'm proud of it.

BY MS. GREENBERGER

Q Now, this part is a little harder to read, so apologies.

A Are you serious?
Q But I'm going to work with you.
A Oh, boy. You're making me feel like I need to get even stronger glasses.
Q So under the bullets -- there are five bullets. I'm not asking you about that.
Right under the bullets, it states, "This agency is not salvageable," correct?
A Yes.
Q And that was the statement that you approved --
MR. KHOJASTEH: That's amazing. Thank you.
BY MS. GREENBERGER
Q -- being --
MR. KHOJASTEH: Do you want this? That's awesome.
THE WITNESS: Whoa. I don't know. Is this better or -- gosh. Okay. Yeah.
What was the question again?
MS. GREENBERGER: Sure.
THE WITNESS: Oh, great. Now I see my

cuticles. Great. Okay.

BY MS. GREENBERGER

Q Under the bullets, it states, "This Agency is not salvageable," correct?

A That's what it says, yes.

Q And that was the statement that you approved being posted on the USAGM website, correct?

A That's my opinion.

Q That was your opinion on March 15th, and it's your opinion today, correct?

A It's my opinion based on many bullet points, but you see the five bullet points at top --

Q I may ask you about the basis for your opinion, but right now I'm just asking that it was your --

MR. KHOJASTEH: She can answer the question without you interrupting her.

MS. GREENBERGER: I'm not interrupting. I'm --

THE WITNESS: That's --

MS. GREENBERGER: -- clarifying.
THE WITNESS: That's --
MR. KHOJASTEH: You literally interrupted --
THE WITNESS: -- my --
MR. KHOJASTEH: -- her.
THE WITNESS: -- opinion based on --
MR. KHOJASTEH: There's a video that will show it.
THE WITNESS: -- massive national security violations, including spies and terrorist sympathizers and/or supporters infiltrating the agency, eye-popping self-dealing involving contracts, grants and high-value settlement agreements, obscene over-spending including nearly a quarter-of-a-billion-dollar lease for a swanky -- I added swanky -- Pennsylvania Avenue high-rise that has no broadcasting facilities to meet the needs of the agency and included in a -- included a $9 million commission to a private real estate agent with connections, hundreds of millions of

dollars being spent on fake news companies, a product that often parrots the talking-points of America's adversaries.

BY MS. GREENBERGER

Q Ms. Lake, I have a large number of questions, and it's going to go faster if you --

A But I want to explain why --

Q -- answer my --

A Because you asked if --

Q I asked --

A -- how I came to --

Q -- a simple -- no, I didn't ask --

A You asked --

Q -- how you came to it. I asked simply whether that was your view that the agency is not salvageable and whether that was your view on March 13th and remains so today.

MR. KHOJASTEH: Object to form.

MS. GREENBERGER: It's a yes or no --

MR. KHOJASTEH: Compound.

MS. GREENBERGER: -- question. Sure. I'll ask it --

THE WITNESS: That was my view --
MS. GREENBERGER: -- separately.
THE WITNESS: -- based on those findings.
BY MS. GREENBERGER
Q Great. And that's your view today?
A My view is that whatever the President decides to do with this agency in conjunction with the legislature, we will abide by that.
Q Is your view today that the agency is not salvageable?
A I believe the agency is very corrupt. We're working to make it not corrupt.
MS. GREENBERGER: I want to -- can I have tab 14, please? Can you mark this tab 14 -- I'm sorry -- exhibit -- what are we up to? He knows. Thank you.
(Deposition Exhibit Number 8 was marked for identification.)
BY MS. GREENBERGER
Q I'm showing you Exhibit 8, which is a tweet that you issued on March 17th, 2025; is

that correct?

A Uh-huh. Well, let me look.

Q Sure.

A March 17th, yes.

Q And in that tweet, you stated that the agency is irretrievably broken? It's the end of your first sentence.

A Yes.

Q And irretrievably broken means not capable of being fixed?

MR. KHOJASTEH: Object to form.

THE WITNESS: I believe, at the time, yes. As you'll see, the follow-up says, "there are bright spots within the agency." So we're working the best we can to make sure it's no longer corrupt and wasting taxpayer dollars. There's two sentences --

MS. GREENBERGER: Do you --

THE WITNESS: -- there.

BY MS. GREENBERGER

Q No, I see. Is your position today that the agency is salvageable?

A I'm proud that we've done things to root out some of the corruption and take control of the agency so that we're not wasting exorbitant amounts of hardworking taxpayers' dollars.

Q And your position as a result of the work that you've done that the agency is salvageable?

A My opinion doesn't matter.

Q Well --

A It's the opinion of the President of the United States that matters. He's --

Q I understand that, but you're in a deposition and I'm asking you for your opinion.

Is your opinion today that the agency is salvageable?

A Maybe. It could possibly be if we work really hard and if the President decides he wants to keep it and Congress decides, but --

Q Have you ever made a public statement --

MR. KHOJASTEH: Just let her finish her

answers, please.

MS. GREENBERGER: I'm sorry. I thought she was done. I'm so sorry.

THE WITNESS: Where was I? You know --

BY MS. GREENBERGER

Q You said if Congress decides.

A Yeah. I mean, I am the -- I am the acting CEO of the United States Agency for Global Media. I'm not the emperor of the United States Agency for Global Media. So there's a lot of -- there's a lot of people who have a say in this.

Q Have you ever made a public statement that you thought the agency was salvageable?

A I don't know if I have.

Q Can you point to any --

A But my public --

Q -- statement?

A -- statements are reflective of the President's agenda. When I'm working at the agency, we're working to follow the law.

Q I want to show you a different -- I want to turn to a different issue, which is, one

particular criticism you have levied is that the Chinese Communist Party has infiltrated the VOA, correct?

MR. KHOJASTEH: Object to form. Lacks foundation. If you want to show her something, go for it.

BY MS. GREENBERGER

Q Well, do you remember --

A Well, let me see. I --

Q Do you not remember making that accusation?

MS. GREENBERGER: It's tab 39, please.

THE WITNESS: Yeah, I've talked about that.

MS. GREENBERGER: Okay.

THE WITNESS: I've talked about that.

BY MS. GREENBERGER

Q I'm trying not to show you excessive documents because there's -- I have to show it --

A Oh, okay.

Q -- give it to the court reporter. He has to mark it.

A Okay.
Q It just makes the day longer, but --
MR. KHOJASTEH: Right. But, Counsel, in all fairness, you showed her a document before that you wanted to show her one sentence and not -- if you just relied on the one sentence, the record wouldn't reflect the second sentence, so just --
THE WITNESS: Which we never got in the record --
MR. KHOJASTEH: Yes.
THE WITNESS: -- by the way.
MS. GREENBERGER: But that's okay, because your attorney at the end can ask questions if he needs to and --
THE WITNESS: Yeah.
MS. GREENBERGER: -- I can ask the questions --
THE WITNESS: Which I did say there are talented and dedicated public servants at the agency.
MS. GREENBERGER: There's no question

pending, Ms. Lake.

THE WITNESS: Okay.

MS. GREENBERGER: Is the document marked?

(Reporter clarification.)

MS. GREENBERGER: Thank you, sir.

(Deposition Exhibit Number 9 was marked for identification.)

BY MS. GREENBERGER

Q I'm going to hand the witness Exhibit 9. Ms. Lake, is Exhibit 9 is tweet that you tweeted -- I'm sorry -- yes, that you tweeted on August 8th, 2025?

A Yeah.

Q And in this tweet, you state that "the CCP has infiltrated VOA and you are paying for it"?

A Yes.

Q And CCP is the Chinese Communist Party, correct?

A Yes.

Q And you've said to the press that the

Chinese Communist Party has been meeting regularly with VOA management to tell them how they should be covering China?

A In the past, they have.

Q Okay. And are you aware of a recent Washington Post op-ed that explains how you've gotten this wrong?

MR. KHOJASTEH: Object to form.

THE WITNESS: How do I want to word that? The Washington Post is the biggest piece of garbage in journalism in this country, and so I know that whenever something happens in this -- in this agency, immediately somebody -- and I'm not sure who -- runs out and reports to The Washington Post --

MS. GREENBERGER: And --

THE WITNESS: -- and I think that was a needed article for these purposes to put that out.

MS. GREENBERGER: Do you understand that -- well, I can show it to you.

Can you pass me --

THE WITNESS: I know what you're talking about.

BY MS. GREENBERGER

Q Okay. And you know that one of the op-ed authors is a senior fellow at the Hoover Institute?

A Yes.

Q And would you agree with me that the Hoover Institute is a conservative think tank?

MR. KHOJASTEH: Object to form.

THE WITNESS: Sometimes.

BY MS. GREENBERGER

Q And you said that you reviewed The Washington Post op-ed?

MR. KHOJASTEH: Object --

THE WITNESS: A bit of it.

MR. KHOJASTEH: -- to form. Mischaracterizes testimony.

BY MS. GREENBERGER

Q Would you admit that your tweet is erroneous?

A No.

Q Okay. Let's move on. On March 13th -- you can put that aside, Ms. Lake.

A I didn't get my information from just the Hoover Institute.

Q On March 13th, you also canceled the wire services?

A Yes.

Q Okay.

MR. KHOJASTEH: Same objection. Vague as to "you."

THE WITNESS: Let me -- let me scratch that. I don't know if that was the exact date, but, yes, I did cancel.

BY MS. GREENBERGER

Q And you personally ordered the cancellation of the wire services, correct?

A In consultation with -- I think Victor was made aware of it.

Q And --

A I believe.

Q Did you consult with anyone before canceling those contracts?

A I'm sure --

MR. KHOJASTEH: Same --

THE WITNESS: -- I did.

MR. KHOJASTEH: I'm going to instruct you not to --

BY MS. GREENBERGER

Q Other than counsel --

MR. KHOJASTEH: Yeah. Apologies.

(Reporter clarification.)

BY MS. GREENBERGER

Q I'm going to restate the question. Other than counsel, did you consult with anyone before canceling the newswire contracts?

MR. KHOJASTEH: Object to form. Vague as to you.

THE WITNESS: Vague as to what?

MR. KHOJASTEH: "You," the word "you." But go ahead. You can answer.

THE WITNESS: Consult with, what do you mean by consult with?

BY MS. GREENBERGER

Q Did you -- did you personally discuss

with anyone the decision to cancel the wire contracts before you canceled the contracts?

A I don't recall who I discussed it with.

Q Are you aware of any documentation reflecting that you consulted with anyone before canceling the contracts?

MR. KHOJASTEH: Object to form. Vague as to documentation.

THE WITNESS: I'm not sure.

BY MS. GREENBERGER

Q Did staff -- well, strike that. Let me ask something else.

The newswire contracts include AP, correct?

A Yes.

Q And Reuters?

A Yes.

Q And did staff express any concerns about the need for those wires?

A Perhaps. I mean, I think that -- I think that perhaps they were wondering how they would work without them because those wires had

become a crutch for a vast majority of American newsrooms.

Q You also ordered in late March a future reduction in force and you -- of the radio broadcast technicians and most other employees; is that correct?

A Can you give me --

MR. KHOJASTEH: Object to -- object to form. Lacks foundation. Vague as to "you."

MS. GREENBERGER: Okay. Can I have tab 33, please? That's not it.

(Deposition Exhibit Number 5 was marked for identification.)

BY MS. GREENBERGER

Q I'm showing you a document that's been premarked as Exhibit 5, which is Ms. Thomas' declaration, which she submitted in this case on March 27th.

So, first, have you seen this declaration before?

A I may have. I may have.

Q And did Ms. Thomas show you this

declaration before it was submitted to the Court? Strike that.

Did you see this declaration before it was submitted to the Court on March 27th?

A Most likely, I did. I just need to refresh my memory, if you don't mind, real quick.

Q Take your time.

A I'm trying to do this quick. Sorry.

Q Sure. I'm going to be asking you about paragraphs 9 and 10 specifically.

A Okay. Let me --

Q Or, actually, 9 through 12, so --

A Okay. Okay. I think I'm ready for your question.

Q Okay.

A I'm skimming this, so -- go ahead.

Q So Ms. Thomas sent an e-mail about an intent to implement a reduction in force, two e-mails, according to paragraphs 9 and 10, correct?

A Okay. Yes. It looks like, on March 25th, she sent an e-mail.

Q And Ms. Thomas did not decide on her own to implement a reduction in force, correct?

A Correct.

Q And that -- was that your decision to implement the reduction in force that's reflected in this document?

A Well, I think we've established that the President put out an executive order calling for the reduction to the statutory minimum.

Q So was that your decision to issue this intent to implement a reduction in force as part of implementing the EO?

A It was the decision of the team, the senior leadership team, that we needed to follow the President's executive order, and in doing so, such entities shall reduce the performance to their statutory functions and associated personnel to the minimum presence and function required by law.

Q So my question is just about the who, not the why. Okay?

A Okay.

Q So --
A And I just told you. The team.
Q And so who was the team?
A Senior career leadership.
Q And who was senior career leadership?
A Well, I -- my attorney, Royce Min, 20 years as a government attorney in the federal government, Victor Morales, 36 years at the agency, Crystal. These are the people who signed off on the -- on the statutory minimum plan.
Q And --
A Crystal --
Q -- ultimately, it was your --
A Crystal -- I'm not done.
Q Oh, I'm so sorry.
A We had the head of -- the CMO, Chris Luer. I'm trying to recall that document. I'm sure you have it. Head of HR was Crystal. I think there were -- Roman Napoli, the chief financial officer. And I think there were a couple more. Terry Balazs and -- did I say Chris Luer?

Q We'll definitely come back to the document, but my question was: Who made the final decision to issue the notice of intention to implement a reduction in force on March 25th --

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q -- 2025?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "final decision."

THE WITNESS: Who made the decision to send the e-mail? Well, ultimately, Crystal sent the e-mail, so she had to make the decision, but this is part of the process. If you are going to consider a RIF, you have to follow a process, and we were following the process.

BY MS. GREENBERGER

Q Who decided to implement a RIF?

A We didn't implement a RIF --

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: We didn't implement a RIF

at that point. As it says here --

MS. GREENBERGER: No, I understand that. My --

THE WITNESS: USAGM's -- we are "enclosing a preliminary notification to the union stating USAGM's intent to implement a RIF for multiple competitive areas."

And then it goes on to say the notifications -- I'm trying to find where -- it doesn't necessarily mean that those people will be RIF'd. It's just notifying. It's a requirement.

BY MS. GREENBERGER

Q It's a requirement that arises once the agency determines --

A What the statutory minimum is.

Q Please let me --

A Sorry.

Q -- finish my question. It's a requirement that arises once the agency determines that it's intending to implement a reduction in force, correct?

A Yes.

Q And so my question is: Who at the agency decided that it intended to implement a reduction in force? That was you, correct?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I think it really was the team, because we had what came down on the 14th as an executive order to -- so the President really decided to reduce the agency to its statutory minimum, and then between the 14th when this came out and when the e-mail was sent out, they came up with what the statutory minimum was.

BY MS. GREENBERGER

Q Okay. So let's turn to that. So you said that you came up with the statutory minimum between the 14th when the EO came out and the e-mails that were sent on March 25th?

A That's what it looks like, yeah.

Q And I think you're referring to a plan that you gave to Congress on June 3rd?

Well, let me ask it a different way.

Are you referring to the plan you gave Congress on June 3rd?

A Can you see -- can you show me what that is?

MS. GREENBERGER: Sure. It's been premarked as Exhibit 3, so let me hand that to you.

(Deposition Exhibit Number 3 was marked for identification.)

MR. KHOJASTEH: Thank you.

MS. GREENBERGER: You can put those aside. I'm not sure we'll need them.

THE WITNESS: Are we still talking about Crystal Thomas' --

MS. GREENBERGER: No. We'll come back to it, but not right now.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q So I'm handing you Exhibit 3 --

A Three.

Q -- which is a document signed by you on June 3rd, 2025, enclosing what you're calling the

USAGM Stat Min, correct?

A Well, yes, I signed the first page, and then senior career leadership signed the last page of this exhibit.

Q And, first, just as a preliminary matter, you signed this as the senior advisor to the chief operating officer?

A Yes.

Q Who was the chief operating officer on June 3rd?

A The acting chief operating officer is Victor Morales.

Q Victor Morales was both the CEO and the chief operating officer?

A Oh, I'm sorry. I thought that said chief -- pardon me. That might be a typo, actually.

Q And so what do you believe that was supposed to say?

A CEO.

Q It should say senior advisor to the CEO?

A Yeah.

Q Okay. And turning to the first -- there's the letter that's on page 1 and then the enclosure that's a --

A Stat min document.

Q -- three-page enclosure. That's the stat min document. Okay. So I'll try to be clear as to my questioning which I'm asking about.

Who drafted the stat min document?

MR. KHOJASTEH: I'm going to object to form, and I'm also going to instruct the witness not to answer questions regarding the preparation of this document to the extent that doing so would disclose attorney-client communications.

You can answer the question she asked, which is a who question.

THE WITNESS: Well, I think it would actually go to attorney-client privilege, because our GC was very much involved in the creation of this, so I don't want to go there.

BY MS. GREENBERGER

Q This document on the top says "Recommendation," correct?

A Yeah.

Q And who is the recommendation being made to?

A I would say to, you know, the CEO, recommendation to whoever is going to ultimately make the decision and how we make the decision. And it's going to be a recommendation to a lot of people at the agency because somebody might be in charge of the Farsi language. Somebody might be in charge of China. So this is recommendation to people as we go forward implementing the executive order.

Q So is this a recommendation that somebody else at the agency needed to approve or disapprove, or is this a final decision?

A It's a recommendation guideline so that we can go forward and effectuate the continuing reduction of the federal bureaucracy executive order.

Q So this was a final decision of the agency, not a recommendation that needed approval, correct?

MR. KHOJASTEH: Object to form. Calls for legal conclusion.

Also will instruct you not to answer to the extent that doing so discloses communications you've had with attorneys regarding the issue of whether this is a -- what did you say, final?

BY MS. GREENBERGER

Q Let me ask it a different way.

Did you understand that after this document was issued, someone had to evaluate it and decide whether to accept or reject the recommendation?

MR. KHOJASTEH: Object --

THE WITNESS: Yeah, I guess.

MR. KHOJASTEH: Yeah, go ahead.

THE WITNESS: Yeah.

BY MS. GREENBERGER

Q And who was that someone who had to decide whether to accept or reject -- or reject

the recommendation?

A I think a lot of people had to at least understand what was going on. And I don't think it needed to be accepted. What needed to be accepted was that the President had ordered us to reduce the agency to its statutory minimum. This is guidance for what statutory minimum is.

Q And it's guidance because the agency had made its determination that this was the statutory minimum, correct?

MR. KHOJASTEH: Object to form. Calls for a legal conclusion.

You can answer.

THE WITNESS: The top senior career leadership signed off and made the decision that this was statutory minimum. I was simply asking them, what is statutory minimum? This is the document.

BY MS. GREENBERGER

Q And they -- when did you -- strike that.

You spoke about the senior leadership,

and there's six people listed at the -- at the bottom. That's the senior leadership you're discussing?

A Yes.

Q And when was this plan, the statutory minimum plan, completed?

A I think it was completed on the date -- the 18th. That's what I believe.

Q March 18th?

A Yeah. Based on the signatures.

Q And --

A It looks like Roman signed it on the 18th.

Q He digitally signed it on the 18th, correct?

A Uh-huh.

Q Sorry. You have to say yes.

A Yes.

Q And I think you said earlier that you had -- on March 15th, you took those actions while the agency determined what the statutory minimum was, correct?

MR. KHOJASTEH: Object to form. Vague. Same objection as earlier. Vague as to "you."

Go ahead.

THE WITNESS: Yes. It is -- I mean, I worked in consultation with the leadership and senior career leadership at the agency, including Victor.

BY MS. GREENBERGER

Q When did USAGM start preparing the stat minimum plan?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I don't have that date. I mean, it was somewhere between --

BY MS. GREENBERGER

Q Not before March 14th, right?

A I don't believe it was, no.

Q Yeah. So it would be sometime between March 15th and March 18th --

A I can't get --

Q -- they started --

A -- into the mind of general counsel if

they were starting to, you know, look at the -- read the tea leaves of what was happening in the government being -- you know, if people started to think about it, but --

Q But to your knowledge, it started after the EO was issued, correct?

A The creation of this memo or this executive summary, that came after the 15th.

Q And when you received this recommendation -- well, first of all, when did you receive this recommendation?

A Somewhere around the 18th.

Q And when you received it, did you adopt it?

MR. KHOJASTEH: Go ahead. You can answer that question.

THE WITNESS: It became guidance for what statutory minium was so that we could effectuate the President's executive order.

BY MS. GREENBERGER

Q And it became guidance as of what date?

A Right around that date.

Q March 18th. And you were the one who determined that this should become the guidance that the agency follows, correct?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. Vague as to "you."

THE WITNESS: I don't know if it was just me, no. I think, you know, we've -- obviously, there were several people who signed off on this.

BY MS. GREENBERGER

Q You had said in your letter to Congress on the first page --

A Okay.

Q -- that it was -- the plan was developed by senior career USAGM leadership.

Other than the six people who are listed at the back of the document, are there any other career USAGM leadership to your knowledge that were involved in developing the plan?

MR. KHOJASTEH: Object to form. I'm going to instruct you not to answer to the extent that doing so reveals attorney-client

communications.

THE WITNESS: I'm going to pass on answering that on the recommendation of my attorney.

MS. GREENBERGER: The identity of career USAGM leadership that were involved in this is not privileged.

MR. KHOJASTEH: If she has -- if she has independent knowledge -- do you want to go off the record and talk about this real quick?

MS. GREENBERGER: Why don't we come back to this. Why don't we talk about it at a break, because I think --

MR. KHOJASTEH: Sure.

MS. GREENBERGER: -- we'll take a break soon.

BY MS. GREENBERGER

Q Speaking of the signatories, Ms. Thomas and Mr. Luer and Mr. Balazs -- apologies for the pronunciation -- they did not either sign it or digitally sign it, correct?

A They did not? No, they did. They did

sign it.

Q Do you understand there's a difference between a digital signature and someone pasting somebody's name in italics?

A Are you accuse --

MR. KHOJASTEH: Object -- object to form. If you think there's a distinction, lay a foundation.

MS. GREENBERGER: Okay.

BY MS. GREENBERGER

Q Did Mr. Min hand sign this document?

A Yes. Some people choose to hand sign.

Q And did Mr. Morales hand sign this document?

A It looks like it.

Q And did Mr. Morali (ph) digitally sign this document?

MR. KHOJASTEH: Mr. --

THE WITNESS: Mr. Morali?

BY MS. GREENBERGER

Q I'm sorry. Mr. Napoli.

A Yeah. That looks like a digital

signature.

Q And what's a digital signature?

A I think it's something that you've placed your signature in a -- you've approved and put it in, right.

Q And the final three signatories didn't digitally sign it; is that correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I mean, this is kind of, I guess, a form of digital signature. They adhered that themselves and sent it back.

BY MS. GREENBERGER

Q You have personal knowledge that each of those three final three signatories adhered their name in italics and sent it back?

A I --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Should I answer?

MR. KHOJASTEH: You can answer.

THE WITNESS: I did not watch them with

the keystrokes, but they sent this back with their signature on it, unless somebody had commandeered their keyboard.

Are you assuming -- are you asking like it was --

MS. GREENBERGER: I'm just asking a question.

THE WITNESS: -- somebody else did that?

MS. GREENBERGER: Ms. Lake, I'm really just asking a question.

THE WITNESS: Okay.

MS. GREENBERGER: I'm not making accusations.

MR. KHOJASTEH: It sounds like an accusation.

THE WITNESS: It really does.

MS. GREENBERGER: It does seem to sound that way --

MR. KHOJASTEH: Before --

MS. GREENBERGER: -- to you guys. It was not my intent, and I think we should move on.

BY MS. GREENBERGER

Q Did USAGM send the statutory minimum document to any other agencies before it was finalized, to your knowledge?

A Send? What do you mean by send?

Q Share a draft of this --

A Share, yes.

Q Okay. And what agencies saw a draft of this document before it was finalized?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Not a draft, but when this form was completed and signed by the senior career leadership at our agency, this was shared with the United States Department of State.

And I believe it was shared -- I don't know if it was shared with OPM. I don't -- strike that. I don't know -- I'm not sure, so I don't want to say if it was.

BY MS. GREENBERGER

Q You're not sure about OPM, but you are sure about Department of --

A Yes.
Q -- State? Okay.
And was this shared with Department of State after the statutory minimum was finalized or before the statutory minimum was finalized?
MR. KHOJASTEH: Object to form. Asked and answered.
THE WITNESS: This -- are you saying this -- before this was created? This was shared with State -- after this was created, this executive summary recommendation, it was shared with the Department of State.
BY MS. GREENBERGER
Q And was there a step between it being a recommendation and it being what the agency was going to follow?
A I don't know about a step. I mean --
Q Was there an approval process?
MR. KHOJASTEH: Object to form. Lacks foundation.
THE WITNESS: This is a guideline to how we would effectuate the statutory minimum.

BY MS. GREENBERGER

Q And once it was --

A And as you can see, we've done a little bit different than this, because this -- the senior career leadership of this agency only wanted 81 or 82 people, and we have more than that.

Q And I'm -- I'll ask you some questions about that.

Does this statutory minimum plan consider how many languages VOA was required to broadcast in?

A It looks like it did.

Q Where in the document is that?

A What's the question? How many languages?

Q Yes.

A Will you repeat that, what you are asking?

Q Sure. Does this statutory minimum plan consider how many languages VOA was required to broadcast in?

A It looks like it says Farsi, China broadcasting, Afghanistan and -- oh, here it is. Afghanistan, Cuba broadcasting, Farsi, Pashto. It would be Pashto and Dari for Afghanistan, Spanish for Cuba.

Q And is your understanding that the statutory minimum plan is saying that there is no requirement to broadcast in any other language?

MR. KHOJASTEH: Object --

THE WITNESS: That's --

MR. KHOJASTEH: -- to form. To the extent that -- you're just asking her to understand this, not -- no communications with her lawyers about what this means and --

MS. GREENBERGER: I'm not asking about her communications with her lawyers. I'm asking about what the document means.

THE WITNESS: What I see in this document, it does not have -- what was the question? What language?

BY MS. GREENBERGER

Q Whether this document is taking the

position that USAGM does not need to broadcast in any of the other languages other than the four that are mentioned.

A What this document says is that these four that are mentioned are the statutory minimum.

Q Did this document -- you said this document was finalized on March 18th, correct?

A That's what it looks like based on the --

Q And --

A -- date.

Q -- did it immediately become the agency position as of March 18th?

A It became a guideline.

Q And what's the difference between a guideline and a position in your view?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I mean, that's pretty obvious. A guideline is something you use as a guideline to decide -- a guide to decide

decisions going forward.
BY MS. GREENBERGER
Q Well, you understood that the EO said that you needed to reduce the performance of the agency's function to the statutory minimum, correct?
A It said -- no. It said, "the non-statutory components and functions of the following governmental entities shall be eliminated to the maximum extent consistent with the law."
Q And so --
A To the maximum extent.
Q And wasn't this statutory minimum document laying out the maximum extent consistent with law?
A Yes.
Q And so how is it that it was only a guideline to guide your decision?
A Well, we --
MR. KHOJASTEH: Object to form. I'm going to instruct the witness not to answer to

the extent that doing so would disclose legal advice you received from your general counsel.

THE WITNESS: I'm going to forego answering that.

BY MS. GREENBERGER

Q So, as of March 18th, the stat minimum document guided the agency's decisions; is that correct?

A That's correct.

Q And is that true till today? This is still the document that is guiding the agency's decisions in implementing the EO?

A It's a foundational document that we can rely on.

Q Are there other foundational documents that the agency is relying on in implementing the EO?

A I think it's just the advice of people who are working in the newsroom, leading the newsroom, and we want to make sure that we are covering those four languages. So we have the ability to have more people occasionally if we

have breaking news or fewer people, but we use this as the guideline for which languages we should be covering.

Q And are there other foundational documents that you look at in guiding the agency's decision-making in implementing the EO?

A Executive order.

MR. KHOJASTEH: Object to form. Asked and answered.

BY MS. GREENBERGER

Q Other than that document?

MR. KHOJASTEH: Same objection.

THE WITNESS: The other -- what was the question?

BY MS. GREENBERGER

Q Were there any documents other than the EO itself and the stat min memo that the agency uses to guide its decision-making to implement the EO?

A Well, a lot of the statute, I guess -- I mean, what my attorneys, which I won't go into, did to come up with -- I'll just stop that.

Q Okay. Other than the statutes and the EO itself and the stat minimum document, are there any other documents that guide the agency's decision-making in implementing the EO?

MR. KHOJASTEH: Object to form. Vague as to documents.

THE WITNESS: The U.S. Constitution, Article II.

BY MS. GREENBERGER

Q Any other documents?

A I think that's good. I mean, there may be others, but I can't think of any right now.

MR. KHOJASTEH: Is this an okay time to take a break?

MS. GREENBERGER: Sure.

THE WITNESS: Are we going to continue on this? How much more do we have on this? Because I'm fine not eating right now.

MR. KHOJASTEH: If there's --

MS. GREENBERGER: I have a good amount more.

MR. KHOJASTEH: So why don't we wait --

why don't we take a five-minute break, and we'll come back.

THE WITNESS: Okay.

MS. GREENBERGER: All right. That's fine.

VIDEO TECHNICIAN: This marks the end of Media Unit No. 2. Going off the record, the time is 12:39 p.m.

(Recess 12:39 p.m. to 12:55 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 3. Going back on the record, the time is 12:55 p.m.

BY MS. GREENBERGER

Q I guess good afternoon, Ms. Lake. So, continuing on with Exhibit 3, when did you first see the statutory min document?

A It would be right around between the 14th, but probably between Monday and -- what day of the week was the 18th? Does anybody know?

Q I believe it was a Tuesday. The 14th was a Friday, Saturday, Sunday. Tuesday.

A I would guess probably -- this is a

guess -- the night before or earlier in the day.

Q Earlier in the day of the day --

A If this was signed --

Q -- before it was --

A What time was this signed? Noon. I don't remember if I saw it that -- I just don't remember, so I'm -- I mean, it's within a window of a few days.

Q But you saw it shortly before it was finalized?

A I saw it before it had all of the signatures.

Q And did you -- did you ask for any changes to the text?

MR. KHOJASTEH: Object to form. To the extent that your communications regarding this document were with general counsel, I'm going to instruct you not to answer.

BY MS. GREENBERGER

Q Let me ask it a different way. Is the version that you first saw the same as the version that we're looking at in Exhibit 3, other

than the signatures?

A I relied on senior career officials to come up with this plan. They have the experience of many, many decades at the agency and in the government, and so I did not call for them to change the plan.

Q So it sounds like the answer to my question is yes, the version you first saw is the same as the version we're looking at here in Exhibit 3?

A I believe so. I mean, maybe a typo here or there was -- roughly the same.

Q And this document says there's an executive summary. Is there --

A Where?

Q I'm sorry. On the top of the statutory minimum.

A It says executive summary?

Q Yes.

A Yeah.

Q And is there another document that's the longer version?

A I don't know.

MR. KHOJASTEH: Object to form. Lacks foundation. I think misunderstands the document.

THE WITNESS: When you say document, I think of this as being a document and this as being a document. Is that what you're referring to? Is there some sort of a memo or a paper that would be a document? What are you referring to as document?

BY MS. GREENBERGER

Q So, at this point, I'm saying, is there a longer version of this plan, this statutory minimum plan, other than this three-page version?

A Anything that would have come before this would be communications had with my attorney.

Q And I understand there was an objection from your counsel, so I just want to make clear that when I'm asking a question about you, I mean you, Ms. Lake, personally. Okay?

A And I think I've made very clear that I'm not an emperor. I am one person at an

agency, and I rely on a team. I rely on the senior career leadership to help come up with this. It wasn't just me. If it were just me, I would have maybe had a different plan --

Q So you --

A -- but I relied on other people. So I work with others.

Q You personally notified Senator Graham on June 3rd about the stat minimum plan, correct?

A Yes.

Q And why did you not -- well, let me ask it a different way.

Did you notify Congress in any other way about this plan between March 18th when it was finalized and June 3rd?

A Between March --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- 18th and June 3rd. I don't know. I'd have to look. I may have had conversations. I talk to people all over. And I don't know, because I don't want to say that I had no conversations with anybody in Congress and

maybe, in passing, we talked about the President's executive order. So I don't know. I really don't.

BY MS. GREENBERGER

Q Do you have any specific memory of telling anybody in Congress about the stat minimum plan prior to June 3rd?

A I'd have to look at my schedule. I don't know.

Q Okay. And --

A And I should note that, you know, you had asked about this, if I thought this was the final -- the end all.

I mention right here to Lindsey Graham -- and I know I mentioned it to Chairman Mast and others -- "While we anticipate being above the originally proposed statutory minimum staffing numbers," which are in this document, "the plan to effectuate the President's Executive Order is still developing."

This was very early. This was very early in the process.

"As we work to adhere to the executive order, please consider this required Congressional Notification."

Q And did --

A So it's a little more fluid.

Q And did you give any prior congressional notification, any formal congressional notification, prior to June 3rd about the stat minimum plan?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I don't -- I think this was the first, but I'm not 100 percent certain.

BY MS. GREENBERGER

Q And why did you wait until June 3rd, to the best of your memory, to notify Congress?

MR. KHOJASTEH: Object to form. To the extent that -- you can answer the question to the extent that it does not reveal communications you had with your lawyers at the agency or elsewhere.

THE WITNESS: I don't think it was any nefarious reason. It was just a lot was

happening. This came down on the 14th. We have -- had a lot of decisions to make. We needed to have a plan developed really in seven days. That was -- this was required.

As it says in the executive order, within 7 days of the date of this order, the head of each governmental entity listed in subsection (a) shall submit a report to the Director of Office of Management and Budget confirming full compliance with this order.

So there's a lot to accomplish, and I think we were working on all -- a lot of moving parts. It's something that was very new to the agency.

BY MS. GREENBERGER

Q And did the agency issue this report to OMB within seven days?

A I believe we did. One of our detailees was from OMB, so I think it was --

Q And are you aware that the 2024 Appropriations Act requires that if there's significant modifications to USAGM broadcast

hours that were previously justified to Congress that that shall be subject to regular notification procedures?

MR. KHOJASTEH: Object to form. Calls for legal conclusion.

And to the extent that disclosing -- you can answer the question. However, to the extent that doing so discloses communications or an understanding you've received from counsel, I'm going to instruct you not to answer.

THE WITNESS: Repeat the question. I apologize.

BY MS. GREENBERGER

Q Do you understand that the 2024 Appropriations Act requires you to notify the Committee on Appropriations if there's significant modifications to USAGM broadcasting hours that were previously justified to Congress?

MR. KHOJASTEH: Same objection.

THE WITNESS: My attorney, GC, was briefing me on a lot of things. I don't want to go into details, but we worked to make sure that

we followed every single step. There are a lot of steps when you make any -- any action you make in government, there are steps that you have to follow, and we worked diligently to make sure we did those. If this is considered late, June 3rd, you know, we were working as fast as we could.

BY MS. GREENBERGER

Q Does this, in your view, constitute notifying Congress of modifications to broadcast hours?

MR. KHOJASTEH: Object to form.

To the extent you have a view independent from that which you learned from communications with counsel, you can answer.

THE WITNESS: The last --

MR. KHOJASTEH: Otherwise, I'm going to instruct you not to answer.

THE WITNESS: Well, I'll just read what's in the last sentence here.

"As we work to adhere to the EO, please consider this the required Congressional Notification to satisfy notice for the potential

reorganization, consolidations, and/or program terminations."

This way, they wouldn't be caught off guard.

BY MS. GREENBERGER

Q And would you agree with me that when Congress appropriates money for broadcasting, they like to know whether that money was used as it was justified by the agency?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: I don't know.

BY MS. GREENBERGER

Q You don't know whether it would be --

A Well, I don't know if somebody might -- somebody might be upset about it, and somebody else might not. You're asking me to get into the minds of members of Congress.

Q I'm not asking about whether they'd be upset. Whether they'd want to know.

Do you believe that the Congress would want to know if money that they had appropriated,

hundreds of millions of dollars, was instead not being used for the purpose that was justified to Congress --

MR. KHOJASTEH: Same --

BY MS. GREENBERGER

Q -- namely, broadcasting?

MR. KHOJASTEH: Same objection. Calls for speculation.

THE WITNESS: There's over 400 members of Congress in the House. I don't know what their desires are.

BY MS. GREENBERGER

Q Are you aware that USAGM has a plan for a government shutdown?

A Yes.

Q And in the event of a government shutdown, USAGM can only retain people who are necessary to perform activities expressly authorized by law?

A Yes.

Q And did you review the most recent government shutdown plan?

A I --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I believe that came across my desk, yes.

BY MS. GREENBERGER

Q And are you aware -- the wrong one -- that the most recent government shutdown plan has 963 people listed as necessary to perform activities expressly authorized --

A Can I see that --

Q -- by law?

A -- please?

MS. GREENBERGER: It's tab 44.

(Deposition Exhibit Number 10 was marked for identification.)

THE WITNESS: I don't know if this is the most recent, to be honest. I think there --

MS. GREENBERGER: Has there --

THE WITNESS: -- might be something -- there might be one that's more recent than this. Do you know what the date --

MS. GREENBERGER: This is from --
THE WITNESS: -- of this --
MS. GREENBERGER: -- 2024.
THE WITNESS: Oh, yeah.
MR. KHOJASTEH: Do you have anything to, like, establish that other than --
THE WITNESS: Yeah. This is --
MR. KHOJASTEH: -- say so?
MS. GREENBERGER: I mean, I was trying to avoid printing dozens of pages. I could --
THE WITNESS: I would rather --
MS. GREENBERGER: -- send you the full document.
MR. KHOJASTEH: I'm just -- I just mean, like, is there anything that you have like the cover page of this that would show that it's --
MS. GREENBERGER: You know what? Why don't we put this aside and we can come back to it after lunch.
THE WITNESS: Yeah.
MR. KHOJASTEH: Again, I'm not trying

to --

MS. GREENBERGER: But --

MR. KHOJASTEH: -- give you a hard time, Counsel, just --

MS. GREENBERGER: But my question --

MR. KHOJASTEH: -- an unauthenticated document that you're showing us with no heading, nothing.

THE WITNESS: And this is, I believe, an old one.

BY MS. GREENBERGER

Q Okay. I want to turn back to the plan. I just have a question that I hope you can answer for me. The number on page 2, the 1,033 -- you might need to squint a little.

A Yeah.

Q Is that the -- what -- what does that number represent?

A The number, it looks like the number of workers at VOA that are in a competitive field. There's noncompetitive and there's competitive.

Q So is that the number that would be

terminated to reach 81, or is that the total from which 81 would be terminated?

A I believe if you're reading this, of the 936, this called -- this plan that was signed off on by career agency staff called for the elimination of 90.6 percent of the staff in Washington, D.C., 3.1 percent in Miami, 2.6 percent in New York, if I'm following this, .7 percent in Greenville.

Q Yeah. So, just so I understand, these are the number of people that would be laid off?

MR. KHOJASTEH: Strike -- object to form. I think she -- mischaracterizes her testimony.

BY MS. GREENBERGER

Q I'm really not. This is not some sort of trick question. I'm just trying to understand this document.

A This -- yeah, this is a little confusing. I don't know.

Q Okay.

A Can you ask Frank that? He would be

better off to ask that.

Q Okay. That's fine. Okay. So you understand that Judge Lamberth -- you can put that aside; we might come back to it -- issued a preliminary injunction on April 22nd?

A Yes.

Q And you learned of it promptly after it was issued?

A Yeah. I'm sure it was promptly.

Q And you understand that Part III of the PI is not on appeal?

A Yes.

Q And that means it's in force right now?

A Yes.

Q And what is your understanding of what Part III of the --

MR. KHOJASTEH: Go ahead. Answer. I'm --

BY MS. GREENBERGER

Q -- preliminary injunction requires? I'm not asking you to disclose any information from counsel.

MR. KHOJASTEH: I'm going to instruct you not to answer to the extent that your understanding of Part III of the order is based on communications you had with counsel.

THE WITNESS: Okay.

MS. GREENBERGER: Are you instructing her not to answer at all?

MR. KHOJASTEH: My instruction stands. I'm going to instruct her not to answer to the extent that her understanding is based on communications she had with counsel.

If you have some independent understanding, meaning you're going to put the order in front of her and ask her what the words on the page mean, go for it, but --

MS. GREENBERGER: Let's move on.

MR. KHOJASTEH: -- if it's based on her -- conversations with us or agency counsel, it's plainly attorney-client.

BY MS. GREENBERGER

Q Did you understand as a defendant in the case that you were required to comply with

Judge Lamberth's order?

A Yes.

Q And did you understand that USAGM is also a defendant and had to comply?

A Yes.

Q Okay. And do you agree that Judge Lamberth was right to issue Part III of the preliminary injunction?

MR. KHOJASTEH: Object to form.

THE WITNESS: Can I see that? I -- I want to see what -- you're asking --

MS. GREENBERGER: I can read it to you.

THE WITNESS: -- if I agree with the judge?

MS. GREENBERGER: Yeah.

MR. KHOJASTEH: What -- could you -- could you at least explain --

MS. GREENBERGER: Sure. I can read to you --

MR. KHOJASTEH: -- read to her or show her what --

MS. GREENBERGER: I'll read to you what

--

MR. KHOJASTEH: -- Part III says?

MS. GREENBERGER: -- Part III is. It's just a sentence, so I --

THE WITNESS: Okay.

MS. GREENBERGER: -- don't know that I printed it up.

BY MS. GREENBERGER

Q But it says, Defendants must, quote, restore VOA programming such that USAGM fulfills its statutory mandate that VOA, quote, serve as a consistently reliable and authoritative source of news --

A Right.

Q -- 22 U.S.C. 6202.

A Yes. Yes.

Q And so my question was: Do you agree that Judge Lamberth was right to issue that preliminary injunction?

A I believe we didn't fight that part. Is that correct, we didn't fight that part? Because we agree.

Q And --

MR. KHOJASTEH: We -- yeah.

BY MS. GREENBERGER

Q It's okay. I'll go to my next question.

And Part III of the preliminary injunction requires you as one of the defendants ensure that VOA continues broadcasting.

Is that how you understand it?

MR. KHOJASTEH: Object to form. Whatever -- I'm going to instruct her not to answer to the extent that any part of her understanding of that order --

MS. GREENBERGER: I'll -- I'll --

MR. KHOJASTEH: -- is based on communications --

THE WITNESS: That's true.

MR. KHOJASTEH: -- with lawyers.

MS. GREENBERGER: I'll withdraw the question.

THE WITNESS: That's true.

BY MS. GREENBERGER

Q Did you take -- so we already established that the injunction was issued on April 22nd.

A I think there was a TRO, right?

Q And there was an earlier TRO --

A Which was --

Q -- from a judge in --

A -- on what --

Q -- New York.

A -- date?

MR. KHOJASTEH: For his sake, let her ask the questions.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q So let me -- let me focus on the preliminary injunction.

Did you take any immediate steps after April 22nd to restore VOA programming?

A Yes.

Q And what were the steps that you took?

A Well, the reason --

MR. KHOJASTEH: Object to form. If you know.

THE WITNESS: The reason I asked about the TRO is that we wanted to figure out what the stat minimum was, and as we were in the process of working through all of this, we were hit with the TRO, which froze us.

We figured out immediately that Office of Cuba Broadcasting was statutorily required, and we -- even though we had taken everybody at OCB and put them on paid administrative leave, we put the graphic up, and we brought them right back. And then we were trying to come up with our plan for statutory minimum, and we had -- we're hit with a TRO and kind of froze in place.

So once the preliminary order happened and we started -- were told to start back up, that we could start back up, it takes time. The machine had not moved for that much of time because of the TRO.

BY MS. GREENBERGER

Q So the TRO, I can represent to you, was

on March 28th.

A Uh-huh.

Q Is your position that you could not start back up, meaning start -- restore VOA programming after the March 28th TRO until the PI was issued?

MR. KHOJASTEH: Object to form.

I'm going to instruct you not to answer to the extent that your understanding of the impact of the March 28th TRO is based on your communications with counsel.

THE WITNESS: I'm going to pass on answering that.

BY MS. GREENBERGER

Q Let me ask it a different way.

Were it not for the TRO on March 28th, would you have different programming on March 29th and thereafter?

A No, I -- it's a process to determine what the stat minimum is and then make what is a big machine move. And it's just a long -- it's a process. There's a lot of -- there's a lot of

moving parts.

Q And on --

A So we were working diligently to make that happen.

Q And so, on March 18th, you determined what the statutory minimum was, correct?

MR. KHOJASTEH: Object to form. Vague as to "you."

BY MS. GREENBERGER

Q So I want to -- you said to Congress that the judge froze us, and maybe -- maybe the better way to ask without asking about your counsel is: What did you mean when you said that to Congress?

A We got hit with numerous malicious lawsuits, and it is a bit of a freezing pattern. You are stuck in the minutia of lawsuits, and it can be -- it can have a chilling effect that kind of freezes you. You're forced to be dealing with this when what you're trying to do is get the agency to stat min.

Q And when you say you were frozen, what

were you unable to do?

A To put 100 percent focus on getting us to stat min.

Q So, when you say you were frozen, it's because you were thinking about the lawsuits? Is that what you're saying?

A No, I'm not saying that. That's what you're saying.

Q I'm really just trying to understand.

When you were frozen, what couldn't the agency do?

MR. KHOJASTEH: Object -- I'm --

THE WITNESS: I've already answered that.

BY MS. GREENBERGER

Q So between March 15th and April 22nd, did any programming restart?

A Office of Cuba Broadcasting, I believe, started up.

Q How about anything else?

A I don't -- I don't recall.

Q Okay.

A That would be a question that maybe Leili or Frank would be better to answer.

Q And Persian News Network broadcasting on TV restarted at a certain point, correct?

A Yes.

Q Okay. So -- and was that point after April 22nd?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I don't have the calendar in front of me.

BY MS. GREENBERGER

Q Okay. So what steps did VOA take to restore VOA -- I'm sorry.

What steps did the agency take to restore VOA programming after it received the PI?

A Well, we --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Trying to figure out how to take the stat min that the President asked for, which is the reduction to non-statutory

components of functions shall be eliminated, so eliminating anything that was non-statutory, keeping what was statutory, and determining how do we take what's statutory and get that over the air.

BY MS. GREENBERGER

Q In late July, you told the press that your goal is to shut the entire agency down as per the instructions of President Trump; is that correct?

MR. KHOJASTEH: Object to --

THE WITNESS: Can I see the --

MR. KHOJASTEH: Object to form. Lacks foundation. If you want to show her something, go for it.

BY MS. GREENBERGER

Q Well, this was quoted in the Court's decision. You read the Court's decision, right?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Okay. Did you read the Court's

decision?

MR. KHOJASTEH: Object to form.

THE WITNESS: I read a lot of things.

MR. KHOJASTEH: Lacks foundation.

THE WITNESS: I really do. It would be nice to have the exact quote and not just skipping sentences like the fake news does.

MS. GREENBERGER: It's document 27. We can mark this.

(Deposition Exhibit Number 11 was marked for identification.)

BY MS. GREENBERGER

Q This is the Court's order dated July 30th, 2025.

A Okay.

Q Have you seen this document before?

A I'm sure I have.

Q Okay. And did you review it soon after it came out?

MR. KHOJASTEH: You can -- you can answer whether you reviewed this or not.

THE WITNESS: I -- you realize we have

a lot of cases? I've seen a lot of this. I probably did.

MS. GREENBERGER: Okay.

THE WITNESS: I probably relied on my attorneys to advise me on this.

BY MS. GREENBERGER

Q So turning to the bottom of page 9, do you see that four lines up from the bottom, the Court says, "Defendant Kari Lake made the following on-the-record statement to a news publication, as reported on July 22nd: Our goal is to shut the entire agency down as per the instructions of President Trump . . . . And so I'm working to eliminate the agency, and it's been a big job, but we're working hard on it."

A What's the question?

Q So my question was: Did you say that to the press?

A Well, there's a dot dot dot dot, which indicates a whole lot was left out. If you'd like to pull the exact interview and show me that, then I'd be happy to make -- respond to

that, but the dot dot dot dot indicates there's a lot that -- a lot that may have been said between the words "President Trump" and the words "and so."

Q So are you accusing the judge of selectively quoting you?

MR. KHOJASTEH: She's not accusing the judge of anything.

THE WITNESS: I'm just telling you I'm not going to respond to it.

BY MS. GREENBERGER

Q Well, my --

MR. KHOJASTEH: Yeah.

BY MS. GREENBERGER

Q -- question is: Do you recall making those two sentences -- that statement?

A I've said a lot of words, but I'd really like to know what's in the middle of that. It could be selective.

Q Do you recall, or you don't recall?

MR. KHOJASTEH: She just answered.

MS. GREENBERGER: No, she didn't.

THE WITNESS: I would like to see the entire -- this is a small segment of an interview, and in typical fashion, the media likes to pull apart just little --

BY MS. GREENBERGER

Q This is not a quote in the media. This is a quote in the court order, correct?

MR. KHOJASTEH: That he's citing from media reports.

THE WITNESS: Yeah.

MR. KHOJASTEH: He's not -- do you think -- just for the record, Counsel, do you think that the judge was the reporter on this?

MS. GREENBERGER: I think you're misunderstanding, sir.

MR. KHOJASTEH: I think, then, you should ask better questions.

MS. GREENBERGER: I think you don't understand the citation.

THE WITNESS: If you --

BY MS. GREENBERGER

Q Let's -- let's move on. I'm going to

come back to this.

So, since the preliminary injunction has gone into effect, the VOA has only broadcast in four language -- is only providing broadcasting for four language services; is that correct?

MR. KHOJASTEH: Object to form.

THE WITNESS: I believe so. Afghanistan, Persian, Cuba and Mandarin.

BY MS. GREENBERGER

Q And prior to your takeover at USAGM, how many languages was VOA broadcasting?

A It depends if you're looking at just VOA or you're looking at the grantees, but dozens.

Q Over 45?

A Sounds good.

Q I think 49's the right number. And did you consult with the secretary -- strike that.

Did you -- so, first of all, I believe the number is 49. Do you -- do you agree that's accurate?

A You say so. It sounds right.

Q And did you consult with the Secretary of State concerning the deletion of the other approximately 45 language services?

A Consulted with the Department of State.

Q And what documents, whether that be e-mails, memos, reflect that you consulted with the Department of State?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I put -- there's a memo that shows that we had that --

MS. GREENBERGER: And who --

THE WITNESS: -- that meeting.

BY MS. GREENBERGER

Q And who was at the meeting?

A Oh, boy. Members of the Secretary's team, high-level members of the Department of State.

Q And when was that meeting?

A I want to say it was the 18th or the 19th.

Q Of what month?

A Of March. So within that seven-day window of the President's executive order.

Q And in that meeting, you said that you were going to stop language broadcast -- stop broadcasting in about 45 languages?

A In that meeting, we discussed the President's executive order, what it meant, what he was calling for us to do at the agency in the executive order, which was to bring this agency down to its statutory minimum, reduce -- that the non-statutory components and functions of the agency would be eliminated to the maximum extent consistent with applicable law.

And then we presented them with the plan that was developed by senior career leadership, who assessed what the statutory minimum is and signed off on it, which is your, I believe, Exhibit 3, showing them which languages we would be doing and would not be doing.

Q And in the fiscal year 2025 budget justification, VOA had represented to Congress

that it would broadcast in, you know, whether it's 48 or 49 languages; is that right?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: In the what? In the what? I'm sorry.

BY MS. GREENBERGER

Q In the budget justification for the 2025 fiscal year.

A What about it?

Q In that budget justification, did VOA represent how many languages it would broadcast in?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: The 2025 budget would have been put together approximately when, that justification?

MR. KHOJASTEH: If you don't know, you don't know, Ms. Lake --

THE WITNESS: Well, I --

MR. KHOJASTEH: -- it's okay.

THE WITNESS: -- believe it was put together by the previous administration before the executive order of March 14th, Continuing the Reduction of the Federal Bureaucracy, was issued. Is that right?

BY MS. GREENBERGER

Q So the budget justification that was issued prior to the EO, do you understand that it represented that there would be broadcasting in 48 or 49 languages?

MR. KHOJASTEH: Object to form. Lacks foundation.

Do you want to ask her whether she reviewed it? Do you want to at least lay the foundation? Does she know what it is, when it was created? These are just foundation.

MS. GREENBERGER: I just don't think those are necessary, but I appreciate the assistance.

MR. KHOJASTEH: It would -- it would have just cut through a lot for you.

THE WITNESS: When was it created? Do

you know the date? I would like to know, because I know it was --

BY MS. GREENBERGER

Q Have you -- have you reviewed the budget justification that was sent to Congress prior to the EO?

A I believe that I have seen that. It was a -- kind of a shiny brochure type. Is that what I'm -- do you have it in front -- do you have it? I'd like to take a look at it. I think I know what you're talking about.

Q Are you aware whether USAGM, prior to the EO, had informed Congress how many languages it would broadcast in?

A I'm assuming they did.

Q Okay. And what do you understand USAGM prior to the EO had told Congress about how many languages it would be broadcasting in?

A Probably dozens, as you said. But, again, the EO came out on March 14th.

Q And in your view, after the EO came out, that controlled and USAGM had no obligation

to comply with what it told Congress?

MR. KHOJASTEH: Object to form.

You can answer that question. However, to the extent that your view of what controls and what doesn't control is based on communications you've had with counsel, I'm going to instruct you not to answer.

THE WITNESS: What was the question?

MS. GREENBERGER: Can you read back the question, please?

(Whereupon, the reporter read the record as requested.)

MR. KHOJASTEH: Same instruction. If you have an independent view separate from advice you received from counsel, you can testify as to it. Otherwise, I'm going to instruct you not to answer.

THE WITNESS: I think I'm going to go with that, you know, I'd rather not discuss what my thoughts are on that based on what my attorney just said.

BY MS. GREENBERGER

Q Do you have no independent view other than what you consulted with counsel?

A I'd like to make sure that I'm not going against counsel's advice.

Q But counsel and I are both saying that if you have an independent view separate from what your attorney told you, you're required to answer the question.

MR. KHOJASTEH: Yeah, if you have a view -- if it's okay -- if you have a view independent of what you had -- the discussions you had with agency counsel or the Department of Justice as to whether the executive --

THE WITNESS: Meaning my view is different?

MR. KHOJASTEH: Whether the executive order as a matter of law governs -- controls over what prior congressional -- this is what you're asking, right? Prior congressional justifications, budget justifications, which one's controlling? If you have a view as to

this, as a matter of law, independent of anything you ever learned from us or from agency counsel, then -- then you can testify --

THE WITNESS: I'm not a legal expert, so my view wouldn't even matter in that. I'm going to go with what my attorneys --

MR. KHOJASTEH: But if you have a view one way or the other as to -- like that's separate and apart from --

THE WITNESS: I understand what you're saying.

MR. KHOJASTEH: Yeah. Yeah. That's why I'm just -- that's --

BY MS. GREENBERGER

Q It's not about whether it matters. It's about whether you have a view. Do you have a view?

A No, I don't.

Q Your declaration, which you can turn back to, which is Exhibit 1 --

A Okay.

MR. KHOJASTEH: We're going August?

MS. GREENBERGER: August, correct.

BY MS. GREENBERGER

Q And I'm going to ask you some questions about paragraph 6, if you want to look at that.

A Okay. Let me read through that real quick.

Q Sure.

A This refers to Mr. Wuco's prior declaration. Do you have a copy of that?

Q I do, although I'm not asking about that paragraph, but that's fine. I can give that to you.

MS. GREENBERGER: Do you remember what that is? Yeah, it's 36.

THE WITNESS: As discussed in depth in Mr. Wuco's --

MR. KHOJASTEH: Which paragraph are we looking at?

MS. GREENBERGER: I'm --

MR. KHOJASTEH: Six, right?

MS. GREENBERGER: Six, which doesn't --

THE WITNESS: Oh, is it b --

MS. GREENBERGER: -- refer --
THE WITNESS: -- 6(b)?
MR. KHOJASTEH: I think you might be looking at the wrong -- is it -- are you looking at August?
THE WITNESS: Six. And then I got down to b here.
MS. GREENBERGER: Yeah. Oh, here. Yeah, there's a little reference to Wuco, so that's fine.
THE WITNESS: Okay.
(Deposition Exhibit Number 12 was marked for identification.)
MR. KHOJASTEH: Thank you. This one is marked what?
MR. BLUMIN: Twelve.
BY MS. GREENBERGER
Q And I'm handing the witness Exhibit 12, which is the declaration of Frank Wuco, dated June 27th, 2025, at the witness's request.
A Okay. Okay. You're just going to ask about 6?

Q Correct.

A Okay. Okay. I'm trying to find where he referred to that. Maybe it was in here. Dari and Pashto. Oh, here it is. Okay. I think I'm ready.

Q Okay. So your declaration of 8/13, which is Exhibit 1, paragraph 6, says that USGM -- "USAGM has identified the language services it is required to maintain" --

A Yeah.

Q -- "namely, Mandarin, Farsi, Dari, and Pashto in accordance with the International Broadcasting Act."

Is USAGM's current view that it is only required to maintain those four language services --

MR. KHOJASTEH: I'm sorry. Guys, do you mind just --

Go ahead. Sorry. I couldn't follow both. Sorry. Go ahead.

BY MS. GREENBERGER

Q Is USAGM's current view that it is only

required to maintain those four identified language services pursuant to federal statutes?

MR. KHOJASTEH: Object to form.

Could you -- could you repeat that question? I just want to make sure that we're not invading the attorney-client privilege here. Go for it.

BY MS. GREENBERGER

Q Well, this says US -- you said to the Court that USAGM has identified the language services it is required to maintain and lists four. Is that still USAGM's position that those are the four required language services?

A Well, as I stated in the June 3rd congressional notification, we anticipate being above the originally proposed statutory minimum. And this is a -- this is what we believe is statutorily required, but we could do more, possibly.

Q Do you understand the VOA -- that there is a statute that states that VOA is required to broadcast via radio to North Korea specifically?

A There's been some --

MR. KHOJASTEH: Object to form. Whatever you understand -- if you're asking her to look at a statute and read the words on the page, great.

Whatever you understand about any of these statutes and what they require and what -- how we're complying with them are subject to attorney-client communications. I'm instructing you not to answer.

THE WITNESS: I'm going by what my attorneys have told me.

BY MS. GREENBERGER

Q Do you understand --

A And general counsel.

Q As the acting CEO of USAGM, do you understand whether or not there is a statute concerning VOA broadcasting to North Korea?

A The general counsel at USAGM put together the stat min documentation. It was part of that process. I didn't pull this out of thin air --

Q I'm not asking about --
A -- to put this together.
Q I'm not asking about the stat min --
A So I'm leaning on -- I'm leaning on counsel.
MR. KHOJASTEH: And we're going to be very careful with how we start answering these questions.
I'm just going to ask you to slow down in your responses --
THE WITNESS: Okay.
MR. KHOJASTEH: -- because I need to make sure -- I want to give counsel the opportunity to conduct her examination, and I don't want to obstruct her ability to ask you your personal views or personal knowledge. But we need to draw a distinction here between what you've learned from counsel -- explaining it to Ms. Lake, not explaining it to you.
You need to draw a distinction between what you learned from counsel and what you yourself know. So go ahead. Go ahead. I'm

sorry, Counsel. Go ahead.

THE WITNESS: In coming up with what statutory minimum was, as you know, I leaned on the career leadership at the agency. Primarily, the general counsel decided what statutory minimum was. I didn't decide. He did. And the rest of the senior career leadership with decades and decades of experience signed off on that.

That's what I lean on. I'm not a lawyer, and so I have to lean on the attorneys at the agency, and I did that.

BY MS. GREENBERGER

Q Is it fair to say that VOA has not provided any broadcasting in Korea at all since March 15th?

MR. KHOJASTEH: Object to form. Object to form. Lacks foundation. But go ahead.

THE WITNESS: So is it fair to say they have not?

MS. GREENBERGER: Yeah.

THE WITNESS: No, it's not fair to say that.

BY MS. GREENBERGER

Q Okay. So what broadcasting has been done in North Korea since March 15th?

A I think we're currently doing some broadcasting.

Q Okay. And when did you start doing broadcasting --

A I'm not sure --

Q -- in North Korea?

A -- when we started.

Q You notified the Court on August 28th that you plan to resume broadcasting to North Korea; is that --

A Yes.

Q -- correct?

A Yes.

Q And so, prior to August 28th, there was no broadcasting to North Korea, correct?

A Prior to August 28th, I don't believe there was.

Q Okay. And so from March 15th to at least August 28th, there was no broadcasting to

North Korea, correct?

A Correct.

Q Okay. And --

A Is that the question you originally asked, or did you say until now?

MR. KHOJASTEH: Just let her do her examination.

THE WITNESS: Sorry. I may have mis-answered the first question. I thought you meant until now.

BY MS. GREENBERGER

Q And since August 28th, what broadcasting has occurred in North Korea?

MR. KHOJASTEH: Object to form. If you know.

THE WITNESS: I would have to have you ask that question of Leili Soltani or Frank Wuco.

BY MS. GREENBERGER

Q Do you have any knowledge about whether there's been any broadcasting since August 28th to North Korea?

A Yes, there has.

Q But you don't know any details?
A I don't have the details, and I don't want to speculate.
Q And is the broadcasting to North Korea in Korean, or do you not know?
A What other language would we put it in?
Q I would hope it would be in Korean. I'm just trying to get your record -- this on record.
A It's in Korean, yeah.
Q Okay. And when did the agency decide to resume broadcasting to North Korea?
A I think it's been a discussion for a while, and we recently decided to do that with the President's tweet about South Korea.
Q And are there -- is there an e-mail or a memo or other documents reflecting VOA's plan to resume broadcasting to North Korea?
A I don't know. Likely, maybe. I don't know.
Q None that you're aware of?
A There's probably -- there may be some.

I just don't know.

Q None that you can identify right now?

A I -- I get a lot of e-mails, so I can't just say yes. I'm sure there were -- I know how I communicate with people. I like to talk to people. Others, in making this decision, may have been e-mailing. I don't know. I don't look at other people's e-mails.

Q Do you believe that the statutory minimum document made a mistake in not listing North Korea, or was it right?

A As I said, it was a guideline. And then, as I reiterated to Congress and to Senator Lindsey Graham and others, we anticipate being above the originally proposed minimum staffing numbers, and we plan to effectuate President Trump's executive order.

Q Is USAGM obligated by statute to broadcast to North Korea?

MR. KHOJASTEH: Object to form. I'm going to instruct you not to answer to the extent that your understanding of what this agency's

obligated to do or how to comply with statute is based on your communications with counsel.

THE WITNESS: That's right. This would violate attorney-client privilege.

BY MS. GREENBERGER

Q If -- you had earlier testified that the -- if I understood your testimony, that the EO -- let me ask it a different way.

Am I right that the EO, in your view, requires USAGM to only broadcast to those countries that it's obligated to broadcast to?

MR. KHOJASTEH: Same objection. Whatever your understanding of the EO is, if you have an independent understanding based on your review of the EO, great. Otherwise, if it's based on your communications with your general counsel, Department of Justice or other agency lawyers, I'm going to instruct you not to answer.

THE WITNESS: I'm not going to answer that.

BY MS. GREENBERGER

Q Why would USAGM broadcast to a country

that it's not required to if President Trump is saying, go to the statutory minimum? I'm just not understanding.

A I am relying on what the attorneys are telling me should be the statutory minimum.

Q And is the decision to broadcast to North Korea based on communications from your counsel?

MR. KHOJASTEH: Object to form.

THE WITNESS: Yes.

MR. KHOJASTEH: I --

THE WITNESS: I'm sorry.

MR. KHOJASTEH: I don't want to start putting attorney-client communications at issue here, so I'm going to -- I'm going to instruct her not to answer.

If there's another way you can phrase that question that doesn't put our communications with counsel at issue, that's fine, but I'm not going to walk into a situation where she's putting the attorney-client privilege at issue. There's a better -- there's other ways to answer

the question -- to ask the question. So you need to be patient here, Kari.

THE WITNESS: Okay.

MR. KHOJASTEH: We have to take our time here.

BY MS. GREENBERGER

Q What's -- I already asked you about what broadcasting has happened to date for North Korea, and you said that I should ask --

A Has happened to state?

Q To date.

A Oh, to date.

Q From August 28th to the present. And you said that I should ask your colleagues, which I appreciate.

What can you tell me about what the agency's plan is for future broadcasting to North Korea?

A Again, I would have you talk to Leili Soltani on that.

Q Do you have any knowledge about the agency's future plan for broadcasting to North

Korea?

A I think decisions are being made and we're assessing.

Q Do you view it as important to the agency to broadcast to North Korea?

A I think it's important to effectuate the President's executive order and make sure that what we're putting out is honest, truthful reporting.

Q And you said something earlier about a tweet concerning South Korea?

A Yeah.

Q Tell me what that tweet said.

A I don't remember the exact part.

Q Roughly.

A It was critical of what was happening in South Korea, questioning what was happening with their leadership in that country.

Q And do you know whether USAGM plans to broadcast in radio or TV or online to North --

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q -- Korea?

A Again --

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: Again, I hate to keep saying this.

MS. GREENBERGER: You don't know.

THE WITNESS: Leili will be able to answer that --

MS. GREENBERGER: Okay.

THE WITNESS: -- and maybe Frank as well.

BY MS. GREENBERGER

Q We'll talk more about the recent RIFs later, but is it accurate that you sent termination notices to every member of the VOA Korean language service?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I would have to look at the list of people that we sent letters to and

compare it with people who didn't get letters.
BY MS. GREENBERGER
Q And did you discuss with members of your team whether or not to RIF members of the Korean language service?
A What date -- the RIF that we just had?
Q Correct. The August RIF.
A Oh, yeah. What was the question?
Q Did you discuss with members of your team whether or not to RIF members of the VOA Korean language service in August?
MR. KHOJASTEH: I'm going to object to form.
To the extent that any counsel were involved in those discussions, I'm going to instruct -- you can answer yes or no as to whether you had a communication about the issue, but you cannot answer -- you cannot share the substance of the communications if counsel were involved.
THE WITNESS: This is regarding the Korean folks who were -- from Korean language

that were RIF'd?

MS. GREENBERGER: Yes.

THE WITNESS: And if I had a conversation with who?

MS. GREENBERGER: Anyone on your team --

THE WITNESS: No.

MS. GREENBERGER: -- other than counsel.

BY MS. GREENBERGER

Q Does USAGM have any plan to your knowledge to broadcast to North Korea without having staff from the Korean language services?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague and confusing.

THE WITNESS: Yeah. We can broadcast without those employees. We can use contractors.

BY MS. GREENBERGER

Q And does USAGM have a plan to use Korean contractors?

A I believe that's how we're going to do a lot of this.

Q And have you --
A But, again, this would be better asked of Frank and Leili.
Q Has USAGM identified how it would hire Korean contractors?
MR. KHOJASTEH: Object to form. Asked and answered.
THE WITNESS: When you say Koreans, you mean Korean nationals?
BY MS. GREENBERGER
Q I mean Korean language speakers.
A Okay. Not Korean nationals. We will be hiring American citizens.
Q I appreciate that explanation, but my question is just about your plan, meaning the agency's plan.
Does the agency have a plan to hire Korean language speakers as contractors?
A As opposed to people who don't speak Korean?
Q As opposed to not having a plan.
A Yeah. We will hire people who speak

Korean to do the programming.

Q And are there e-mails or memos or other documents that --

A I just don't know.

Q -- describe that plan?

A I don't know. I'm sorry. I didn't mean to step on her.

MS. GREENBERGER: Okay. Why don't we go off the record.

VIDEO TECHNICIAN: This marks --

THE WITNESS: Off the record?

VIDEO TECHNICIAN: Sorry. This marks the end of Media Unit No. 3. Going off the record, the time is 13:43 p.m.

(Whereupon, at 1:43 p.m., a luncheon recess was taken.)

A F T E R N O O N S E S S I O N

(2:32 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 4. Going back on the record, the time is 14:32 p.m.

WHEREUPON,

KARI LAKE

was called for continued examination, and having been previously duly sworn, was examined and testified further as follows:

EXAMINATION BY COUNSEL FOR PLAINTIFFS CONTINUED

BY MS. GREENBERGER

Q Ms. Lake, turning to Exhibit 3, which is the congressional notice from June 3rd.

A Okay.

Q Your second to last paragraph states, "While we anticipate being above the originally proposed statutory minimum staffing numbers, the plan to effectuate the President's Executive Order is still developing."

Do you see that?

A Uh-huh.

Q And when you say you "anticipate being above the originally proposed statutory minimum staffing numbers," did that mean that you also anticipated being beyond the language services and countries listed on page 2?

A Well, when I wrote this, the plan was still developing. I mean, this was just June 3rd. We're dealing with a lot of lawsuits coming in, and we're still developing the plan.

Q So, possibly, is that your answer?

A I guess you could say possibly. I mean, we are above the number that -- that the career senior staff suggested, which was, I think, 81 or 82.

Q And you are also broadcasting to areas that are above what is laid out in the statutory minimum plan, correct?

A Yes.

Q And what are those areas?

A Russia, I believe, and Korea.

Q We've already discussed Russia -- I'm

sorry -- Korea.

When did you -- when did the agency begin broadcasting to Russia --

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q -- after --

A Pardon?

Q -- after the March 15th shutdown?

A Roughly the same time we started broadcasting to Korea.

Q So, earlier this month, is that about right?

A Earlier this month, yes, I think so.

Q Have you notified the Court that you are broadcasting to Russia?

A I'm not --

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q Are you aware whether or not you've notified the Court?

A I -- if we haven't, I think we may be

doing that shortly. I'm not sure if we have.

Q And are you --

A A good question for attorneys.

Q Are you using contractors or agency staff to broadcast to Russia?

A That --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: That would be a question for Frank --

MS. GREENBERGER: Okay.

THE WITNESS: -- or Leili.

BY MS. GREENBERGER

Q And what is the nature in terms of the medium of the broadcast to Russia?

MR. KHOJASTEH: Object to form. Lacks foundation:

THE WITNESS: Sorry. My wheel is caught on this little outlet under here.

What was the question?

BY MS. GREENBERGER

Q Are you broadcasting to Russia in

radio, TV, or some other way?

A I'm not sure.

Q And when did the agency decide to resume broadcasting to Russia?

A I think I just answered that. Roughly about the same time that we did Korea.

Q And why did the agency decide to resume broadcasting to Russia?

A We just made --

MR. KHOJASTEH: Object to form.

To the extent that -- you can answer the question to the extent that its -- the reason why we're doing -- we are or are not doing anything is -- strike that.

Object to form. I'm going to instruct you not to answer that to the extent that doing so would reveal attorney-client communications, but you can answer the question if it's not based on communications you had with a lawyer.

THE WITNESS: It's based on communications I had with a lawyer.

BY MS. GREENBERGER

Q And does the agency have any documentation in terms of an e-mail, memo, other -- other documents about what its plan is to broadcast to Russia?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I don't have any -- I don't believe I have any on that. You might want to ask Frank that, how he's communicating.

BY MS. GREENBERGER

Q Turning back to the language that we had just read in your June 3rd letter, how could the agency effectuate the President's executive order if it goes above the statutory minimum?

MR. KHOJASTEH: Object to form. Mischaracterizes the document. Lacks foundation.

THE WITNESS: How could the agency effectuate the President -- well, I think we're effectuating it right now. And this was our first document on statutory minimum put -- put together by the career agency staff, and as I

said here, we anticipate being above the originally proposed statutory minimum staffing --

MS. GREENBERGER: Let me ask --

THE WITNESS: -- as we effectuate -- and, you know, news -- for example, in the Persian language or any news operation, if it's a slow news day, you're not staffed as big, perhaps, as if there's a ton of things happening. A big story breaks, you bring more people in.

BY MS. GREENBERGER

Q And is your view that if there's a big story, the agency is required under the statute to bring more people in?

MR. KHOJASTEH: Object to form.

To the extent that answering that question discloses attorney-client communications, I'm going to instruct you not to answer. If you can answer that question independent of any communications you've had with counsel or any understanding you've obtained from counsel, you can answer.

THE WITNESS: I will use an example of

the Farsi language, when the strikes happened and we went into breaking news mode, and we brought more people in to cover that story. There's normal news mode and breaking news mode.

BY MS. GREENBERGER

Q Yeah. I was going to ask you some questions about that.

And Mr. Wuco talks about, I think, what you just called the breaking news mode in his declaration, which is in front of you.

A Is that the 12-page one?

Q I believe so.

A That's Kari Lake, Kari Lake.

Q It's already been marked.

A This is Kari Lake's declaration. Is it stapled to another one?

Q No. I'm pretty sure -- because you looked at it --

A You took one back. You grabbed one from me. Is it possible that was the one?

Q If I did that, that was a mistake.

MS. GREENBERGER: Do you know what

exhibit it was?

MR. KHOJASTEH: It's Exhibit 12.

MS. GREENBERGER: It's Exhibit 12.

MR. KHOJASTEH: Which I don't think we've been marking them as we've been putting them in front of you.

THE WITNESS: No, I don't --

MS. GREENBERGER: I have.

MR. KHOJASTEH: Oh, they are. That's right.

MS. GREENBERGER: I did mark it.

MR. KHOJASTEH: Stickers are there.

THE WITNESS: Yeah. 1, 6, 9, 8, 7. I don't have it, guys. It's a thicker one, I think.

MR. KHOJASTEH: It's not. It's like a -- it is --

MS. GREENBERGER: Okay. We'll -- we'll --

THE WITNESS: Oh, here it is. Okay.

BY MS. GREENBERGER

Q All right. So you were just talking

about the surge capacity in Iran, correct?

A Yes.

Q And Mr. Wuco discusses that in his declaration, I believe in paragraph 3 and 4.

A Yeah. Yeah.

Q And do you have an understanding about whether you're required to have surge capacity?

MR. KHOJASTEH: Object to form. Whatever understanding you have, as long -- if it's based on communications you had with counsel, I'm going to instruct you not to answer.

THE WITNESS: I think that it was important -- it was a really big moment for Iran. This is possibly the biggest moment in the history of -- modern history of Iran in the past 40, 50 years, and we decided -- we made a call to surge our coverage, and I think it was an excellent call.

BY MS. GREENBERGER

Q And Mr. Wuco says, "The surge operation" -- this is paragraph 4 -- "was highly successful because we maintained access to

critical talent."

Do you agree with that?

A Yeah. I think -- I think there's talent inherent in every human being.

Q And the critical talent he was referring to was journalists?

A Some of them are journalists. Some of them are technicians, people who are able to report.

Q And it includes journalists with specific knowledge about the region?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: Some, yeah.

BY MS. GREENBERGER

Q And for a journalist to cover events in Iran to the Iranian people, they need specialized language capacity in Farci?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: I think some do. If they're on the air and we're broadcasting to

folks who speak Farsi, it's important to speak Farsi.

BY MS. GREENBERGER

Q And USAGM was able to maintain access -- that's the phrase he uses here -- because it employed those journalists and was able to call them back from leave; is that correct?

A That's right. Paid administrative leave. They're all still working. They're -- I mean, they're still on the -- on the payroll.

Q And if VOA terminates those journalists, it won't be able to respond in surge capacity as needed?

A That's not true.

MR. KHOJASTEH: Object to form. Calls for speculation.

BY MS. GREENBERGER

Q Why is that not true?

A Because we can hire contractors.

Q Does it take time to hire contractors?

MR. KHOJASTEH: Object to form. Lacks

foundation.

THE WITNESS: Not necessarily. It doesn't take a lot of time.

BY MS. GREENBERGER

Q Does -- do you know how long it takes to locate contractors with specialized knowledge of the region and language capacity?

A Well, we have been able to do that so far.

Q And how many contractors have you been -- when you say you --

A I don't know. That's a question for Frank. We just hired some Korean broadcasters.

Q And you don't know how long it took to hire them, correct?

A Not long.

Q Going back to your declaration, paragraph 1, the 8/13 declaration. I'm sorry. Paragraph --

A Which --

Q -- 6?

A Exhibit what?

Q I think it's Exhibit 1.

MR. KHOJASTEH: This is August?

MS. GREENBERGER: August.

THE WITNESS: Okay. Just gave myself a paper cut. Ouch.

MS. GREENBERGER: Oh, I'm sorry to hear that. I'm going to ask the court reporter to mark this.

(Deposition Exhibit Number 13 was marked for identification.)

BY MS. GREENBERGER

Q I'm handing you Exhibit 13, which is a section of the United States Code, 22 U.S.C. 6201.

Now, your declaration, paragraph 6(a), refers to that section of the code, correct?

A Give me a minute here.

Q Please.

A Just -- just 6(a), not 6(b)?

Q Correct. I'm starting with 6(a).

A Okay.

Q And your declaration cites section 4 of

6201, so I'd ask that you read that section.

A Uh-huh.

Q Let me know when you're ready.

A Okay.

Q What are the countries in Asia which lack adequate sources of free information?

MR. KHOJASTEH: Object to form.

To the extent you have independent knowledge, Ms. Lake, as to that question, that's fine, but if you're relying on advice you've received from counsel, I'm going to instruct you not to answer. But if you have an independent understanding of what countries of Asia lack adequate resources -- adequate sources of free information, you can answer the question.

THE WITNESS: I think when we're looking at statute, it's important to look at other statute as well, and other statute talks about not being duplicative. As a matter of fact, I think it's in the IBA. It says, do not duplicate. And so areas where other broadcasting is being duplicated -- this is what I'm assuming

came into play when we were putting the statute together, when folks were looking at the statute -- there's already programming that's playing out in many Asian countries through credible -- not credible, necessarily. I wouldn't go that far with CNN -- through American broadcast companies.

BY MS. GREENBERGER

Q So my question was just: Which countries in Asia lack adequate sources of free information?

MR. KHOJASTEH: Same objection and same instruction.

THE WITNESS: I don't have an opinion on that.

BY MS. GREENBERGER

Q And as the head of USAGM, you did not come -- strike that.

Does the agency have a conclusion as to which countries of Asia lack adequate sources of information --

MR. KHOJASTEH: Object to form --

BY MS. GREENBERGER

Q -- of free information?

MR. KHOJASTEH: She's not here as a 30(b)(6) witness. If you want to notice a 30(b)(6) witness as to what the agency's position is on anything -- she's a fact witness.

And what we discussed outside was you wanted to ask her personal knowledge. There's a way you can frame the question to get to where you're going, like, Ms. Lake, do you have any personal knowledge of countries other than China that aren't free -- don't have free information, right? You can ask that question, and you'll get your -- you'll get an answer, but don't turn this -- don't attempt to turn this into --

MS. GREENBERGER: I'm not turning this --

MR. KHOJASTEH: -- a 30(b)(6) deposition.

MS. GREENBERGER: She is the head of the -- we don't have to have more conversation. I hear you.

MR. KHOJASTEH: I'm with you.

BY MS. GREENBERGER

Q Ms. Lake, do you have any personal knowledge of what countries in Asia lack adequate sources of free information?

A I think it's up for debate. There's probably some countries that people think aren't fully democratic and some who are -- that are.

Q And I'm asking your personal belief.

A I think one is China.

Q And other than China, are there any other countries of Asia which lack adequate sources of free information?

A There may be free information that is coming in from other broadcasters, in which case the statute would require that we don't compete with other American broadcasters.

I think -- I think I get where you're going with this, which is why are you not in this country, country A, country B, country C.

Q But I'm not asking you to get where I'm going. I'm just asking you to answer the

question.

So what countries of Asia lack adequate sources of free information to your personal knowledge other than China?

A China.

Q China is the --

A I believe China --

Q -- only one?

A I believe China is the one.

Q Thank you. Now, in paragraph 13(r) of your declaration, you said that there were three employees in the China team; is that correct?

A Was this the one in August?

Q Yes.

A Okay. 13(r). I believe that either Frank or Leili help put this together.

Q Do you understand that to be accurate?

A If we put it in --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- it was accurate.

MR. KHOJASTEH: Mischaracterizes the document.

MS. GREENBERGER: Okay. I'm not trying to mischaracterize the document.

BY MS. GREENBERGER

Q How many employees --

A This --

Q -- are involved in --

A This says three.

Q Do you recall telling Congress, I believe we have about 15 people we'll be staffing for our --

A Yes.

Q -- Mandarin coverage?

A That doesn't mean that just three -- that there's only three that are assisting with Mandarin coverage. There's other people who assist. There's people on this list who can do more than one thing.

Q And so how many people are working on Mandarin coverage?

A Today, I don't know. We'd have to ask Frank or Leili.

Q And in June, was it about 15?

A If I said it was 15 in June, then I probably checked that day.

Q And as of August 13th, do you believe it was also 15?

A We -- we may have had more. This is just three that are -- were three employees that were with -- their description of their job was in the Mandarin service.

So, if you see here, East Asia Pacific division, China Branch, Mandarin Service, one employee. East Asia Pacific Division, one. So you can add up how many people. And then you can add up also when you look at people who are doing the digital media. They can do it for more than one language.

Q And so, when you say the digital media, where are you referring to in your --

A I'm --

Q -- declaration?

A -- just giving an example. There's other job positions where if you are a radio technician or if you do work that's technical,

you may work for more than one language.

Q Do you understand how many employees VOA will have in the Mandarin division after the August 29th RIFs go through?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I'm not sure exactly how many will be in the Mandarin, but I think what we're doing is we're trying to have specific languages for people who actually speak that language where it's needed to speak that language. And then you're going to have some people who work in the organization, the outlet, VOA, that can do work in each language.

BY MS. GREENBERGER

Q Ms. Lake, I realize there's a question I meant to ask you earlier.

You spoke about the agency restarting broadcasting in both -- in both Russian and Korean, correct?

A Yes.

Q Does the agency currently have plans to

restart broadcasting in any other language?

A Not that we've discussed.

Q And does the agency currently have plans to reclass -- to restart broadcasting in any other countries?

A Not that we've discussed.

Q And does the agency currently have plans to restart broadcasting in any other mediums, meaning radio where it had only been TV?

A That's possible.

Q Are there currently any plans to do so?

A Not that I'm aware of.

Q Okay.

A You'll have to talk to Frank. I mean, I don't -- I don't know how far into the Korean and Russian that we've gotten. It could be a little ways in and just doing digital or we could be doing radio and digital, so I don't have the answer.

Q Would you agree with me that China is important in terms of United States foreign policy?

A Yes.
Q I believe you discussed that when you testified to Congress, there was about 15 people staffing the Mandarin coverage, correct?
A That's what I said, yes.
Q And am I right that the Cuba team is 33 people?
A 31 or -- somewhere between 31 and 33.
Q And the Iran team is 27; is that correct?
A Roughly. Again --
MR. KHOJASTEH: Object to form. Where -- are you pulling from this thing, or is there some other place you're -- are you referring to --
MS. GREENBERGER: I'm just asking her --
MR. KHOJASTEH: -- congressional testimony --
MS. GREENBERGER: -- a question. If she -- if she needs a document, I'm sure she can tell me.

MR. KHOJASTEH: Sure. Then object to form. Lacks foundation. There's no date frame here.

THE WITNESS: This could -- these numbers could be a little bit different. This was back in August. Now we're in September. So if you want specific numbers, I'd like -- you'd need to talk to Leili or Frank.

BY MS. GREENBERGER

Q How did the agency come to the decision to have roughly half the number of people in the Mandarin unit as compared to the Iranian team or the Cuban team?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Well, the Cuban team is a different -- completely in a different building in a different city, and so you need -- you need more people to run the operation. You need people who are in different, you know, office positions. So that's -- and that -- and that is a relatively lean operation.

BY MS. GREENBERGER

Q And then how about as compared to the Iranian team?

A Well, I think more --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- people are -- I think more people are with the Iranian team, but they're also doing other languages besides that. So if somebody from the Iranian team is one of the technicians who just happened to be categorized in the Persian team, and then, when we made changes at the agency to bring it to statutory minimum, that person could also help us with our programming in -- you know, in Dari and Pashto or Mandarin.

BY MS. GREENBERGER

Q So I'll just turn to right now on -- on paragraph 13 of your declaration, which I think is right in front of you. It lists six employees for the Persian News Network and 21 employees for the Persian News Network Central News and Production Unit. You see that?

A Uh-huh. Wait. Which line is that, r? No, wait.

Q U and v, I believe.

A Okay.

Q Is there anyone else on this list in paragraph 13 that are part of the --

A If you look --

Q -- Iranian team?

A -- at production unit, the people that we happened to -- that -- that the news operation happened to utilize to get productions up happened to be people who were with the Persian News Network.

We categorize people. There's -- in different languages, and so, 21, many of them are people who are in our -- the technical side, the production side. And they're also used -- being used for -- the way I understand it, they do production work for our Persian news, but they also do production work for China for -- or for the Mandarin language. They also do production work for Dari and Pashto.

When it comes to the production and technical side, those are people who can operate in any language. We just happen to have more of them pulled from Persian.

Q And what document delineates the countries that people in various categories here actually do the work for? Is there an e-mail, a memo --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Explain -- I don't run the news operation.

MS. GREENBERGER: You know what? I'll ask someone else that question.

THE WITNESS: Yeah. That would be great.

BY MS. GREENBERGER

Q Turning to paragraph 6(a) of your declaration, this states, "VOA covers news in Mandarin via the internet and major social media platforms."

Do you see that?

A Yeah.

Q And there is no radio broadcasting in Mandarin as of August 13th, correct?

A Again, Frank would be better to answer this or Leili.

Q Okay. But this was your declaration that you submitted --

A That's right. And I'm --

Q -- to the Court.

A -- answering questions that the judge asked, and so in order to adhere to the judge's orders, I had to lean on people like Frank and Leili to come up with an answer. So you've got this here. If you want me to read it --

Q No, I don't want you to --

A -- I'm happy to do so. In accordance --

Q If the answer is you don't know the answer, that's fine.

A The answer is that my team knows the answer.

Q What I want to make sure, Ms. Lake, is

that I spend our time today making sure I understand what you know. If the answer is, ultimately, we'll follow up with another member of your team, that's --

A Yes.

Q -- fine. But what I don't want them to say is, oh, yes, Ms. Lake knows, and I go back to this transcript, and Ms. Lake never answered whether or not she knows. So I just want the record to be clear.

A I don't run the newsroom. I don't run VOA.

Q Do you know whether or not there is radio broadcasting in Mandarin as of August 13th?

A And as I've said, this is a question you'll have to ask Leili Soltani or Frank Wuco.

MR. KHOJASTEH: Can I help you, Counsel?

MS. GREENBERGER: You can instruct --

MR. KHOJASTEH: She -- she's --

MS. GREENBERGER: -- your client to answer the question, sure.

MR. KHOJASTEH: Sure. Yeah. Well, I'm just trying -- I think --

THE WITNESS: I don't have an answer --

MR. KHOJASTEH: -- the distinction --

THE WITNESS: -- and I don't want --

MR. KHOJASTEH: -- the distinction --

THE WITNESS: I could guess.

MR. KHOJASTEH: It's like the distinction -- she is not asking who is best suited to answer the question.

THE WITNESS: She's asking --

MR. KHOJASTEH: She's asking whether you personally sitting here today have any knowledge anywhere in your brain as to whether radio is being -- Mandarin is being broadcast in radio. It's -- it's not -- you're not testifying as to whether it is or not. It's just as to whether you know it is or not.

THE WITNESS: It may be or may not. I don't know and I don't -- I have a guess, but I don't want to guess.

BY MS. GREENBERGER

Q That's fine. I don't know is your answer to whether radio was broadcast in Mandarin. As of August 13th, you didn't -- you don't know, correct?

A I have a guess, but I'd rather you ask somebody who can verify it with certainty.

Q And do you know one way or another whether USAGM -- I'm sorry -- whether VOA did TV broadcasting in Mandarin at any point since March 15?

A Again, I would rather you ask the people who can give you a certain answer.

Q Would it have to be a guess for you to answer the question?

A Yeah.

Q What radio programming has VOA been broadcasting since April 22nd, when the preliminary injunction was issued?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I would rather you ask

the people who are actually doing that.
BY MS. GREENBERGER
Q Is your answer that you don't know what radio programming?
A No. I can see what you're trying to do. I'm not running VOA. I am the head of the agency right now, and I am leaving it to the people that I have put in charge to do that.
Q Ms. Lake, I'm not trying to do anything. I'm just trying to understand what radio programming USAGM has been broadcasting, and you're here today.
A Okay.
Q And so if the answer is you don't know, that's your answer, but I'm entitled to ask the question --
A You may -- you may ask the question.
Q -- whether VOA --
A And this is -- this is fluctuating, so we may have not been doing it before and now we are, and so --
Q And that's what --

A -- I don't want to give an answer that's inaccurate. I'm under oath, if I may remind you.

MR. KHOJASTEH: Counsel, if -- this is where foundation -- if you ask the question, do you know whether -- right? I'm just saying, if you lay the foundation, I think it's going to --

BY MS. GREENBERGER

Q Have you ever --

MR. KHOJASTEH: It's annoying, but --

BY MS. GREENBERGER

Q -- received any information about what radio programming VOA was engaged in?

A Well, let me look back at this, because I know that we were doing -- well, we obviously were doing radio in Cuban -- to Cuba in Spanish, and I am not sure if we're doing radio -- I think we're doing radio in Dari and Pashto.

But, again, I don't want to give you an answer that is not accurate, and so I would much rather you talk to Frank, who I believe is scheduled for a deposition coming up here in

the -- in the coming week or so. If you're just trying to get me to say I don't know, I don't know, I get what you're trying to do, and I just would rather you have facts, because I don't like to not give solid answers.

Q Ms. Lake, I don't want to argue with you.

A I'm not arguing with you.

Q The point of a deposition is to ask questions and see the information you know. If you don't know, you can say I don't know, but that --

A I'm not --

Q -- someone else --

A I'm not certain.

Q -- might know better --

A I'm not certain.

Q And that's fine. You can say, I'm not certain, but then give the answer that you believe to be true, so long as it's not a guess. Okay?

A I'm not certain --

Q And your counsel would instruct you the same.

A I'm not certain and I'm going to let somebody who is certain answer, and that's why I hope you ask that question of Frank Wuco and Leili.

MS. GREENBERGER: Can you mark that for a ruling, please?

MR. KHOJASTEH: Counsel --

MS. GREENBERGER: The standard is not being certain.

MR. KHOJASTEH: No, I got you, but I think, again, like, you're -- when I asked you to lay a foundation, you asked a slightly different question, have you ever received information.

You're asking her, sitting here today, do you -- do you know whether, and whatever your question is, do you know whether. That's -- and then she's either going to say, yes, I know or, no, I don't know.

BY MS. GREENBERGER

Q Sitting here today, do you know whether

the agency has provided any radio programming to Iran?

A I'm not certain.

Q What is your best understanding of whether or not the agency has provided any radio programming to Iran since March 15th?

A I'm truly not certain. I really don't know. You need to ask Leili, who is leading that.

MR. KHOJASTEH: I think you have your answer on that one.

THE WITNESS: I really -- I mean, I'm not trying to dodge the -- I'm not certain.

MS. GREENBERGER: I --

MR. KHOJASTEH: Ms. Lake, it's okay for you -- don't worry about what you think she's trying to do.

THE WITNESS: Okay.

MR. KHOJASTEH: It's okay for you to say I don't know.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q Does VOA keep track of audience statistics?

A I believe they are tracking that through -- yeah, through social media and the number of hits they're getting on social media and number of views that the videos are seeing.

Q And how about as to radio or TV broadcasting? Does VOA track audience statistics for radio or TV broadcasting?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Do you track it? Does the agency track it?

A The agency does --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- track that --

MR. KHOJASTEH: Lacks foundation.

THE WITNESS: -- kind of thing.

BY MS. GREENBERGER

Q And have you seen any statistics about

VOA audience numbers?

A Leili gives a report. She tries to keep updated. I have not taken -- she sent me a report a couple days ago, and I've been a little bit busy with other things and I haven't had a chance, but I know she sounded, like, very happy.

Q And how frequently does she provide a report about VOA audience statistics?

A I think she tries to keep us on top of what's happening with what -- relatively frequently, she sends things to Frank.

Q And does her report cover internet audience, TV audience, radio audience or something else?

MR. KHOJASTEH: Object to form.

THE WITNESS: I --

MR. KHOJASTEH: Lacks foundation.

THE WITNESS: I assume it's all eyeballs and all ears.

BY MS. GREENBERGER

Q And when you say you were -- I don't want to misquote you, but I think you said

something like relatively happy or quite happy with the most recent report.

What did you say?

A I said --

MR. KHOJASTEH: Mischaracterizes testimony.

THE WITNESS: I said Leili seemed very happy.

BY MS. GREENBERGER

Q Leili seemed happy. And --

A Yeah.

Q -- why was Leili happy, if you know, about the most recent report?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I think I heard her say something -- I don't remember the exact words, but she said something about it's been a great week or something like that, to those effect.

BY MS. GREENBERGER

Q Do you know how audience statistics from this summer compare to audience statistics

from last summer for the agency?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: It would be much different because we have been effectuating President Donald J. Trump's executive order, and so to even compare, it would be comparing apples to oranges.

BY MS. GREENBERGER

Q You would expect the audience numbers to be lower?

A We're covering fewer languages, but I would say the way to compare would possibly be to look at the languages that we're covering and maybe compare that way. The beautiful thing is it's -- this is not an agency that is about ratings, per se. We don't have to -- you know, it's a federally funded agency.

Q Is it about impact?

A It's -- it's about impact. It's --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: And it's about if the story is reaching people and the story is fair and honest.

BY MS. GREENBERGER

Q And when you say it's about whether the story is reaching people, do you consider whether the story is reaching a significant audience?

MR. KHOJASTEH: Object to form.

THE WITNESS: Not necessarily.

MR. KHOJASTEH: Vague as to significant audience.

BY MS. GREENBERGER

Q Ms. Lake, what nations do you consider to be affected by censorship or repression?

A I don't have a list.

Q Would you agree with me that Russia is a nation affected by censorship or repression?

A Probably to some extent.

Q How about Vietnam? Would you agree with me that's a country where people are prevented by censorship or repression from speaking to their fellow countrymen?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I don't have enough reliable information on that to discuss it right now.

BY MS. GREENBERGER

Q How about Nicaragua? Would you agree with me that Nicaragua is a country where people are prevented by censorship or repression from speaking to their fellow countrymen?

MR. KHOJASTEH: Same -- same objection. Lacks foundation.

THE WITNESS: Are we going to go through every 191 countries here?

MS. GREENBERGER: No. I have about eight.

And you can have a standing objection to this line of questioning, so we can get through it quickly.

THE WITNESS: I don't have an opinion.

BY MS. GREENBERGER

Q On Nicaragua?

A On Nicaragua.
Q Do you have an opinion about Mali and whether that's a country where people are prevented by censorship or repression --
MR. KHOJASTEH: Object to --
BY MS. GREENBERGER
Q -- from speaking to their fellow countrymen?
MR. KHOJASTEH: My objection -- this is just -- you've established what you're referring to. Object to form for this line of questioning. It's --
MS. GREENBERGER: Yeah, standing. It's a standing objection to this line.
THE WITNESS: What is the question again?
BY MS. GREENBERGER
Q Mali.
A I understand, but what's the rest of the question?
Q Would you agree with me that Mali is a country where people are prevented by censorship

or repression from speaking to their fellow countrymen?

A It's possible.

Q Do you have a view whether it is or it isn't?

A It's just possible.

Q How about Sudan? Would you agree with me that Sudan is a country where people are prevented by censorship or repression from speaking to their fellow countrymen?

A Yes, it's possible.

Q Have you concluded that it is a country, or you just don't know?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: If Sudan is a country or I don't know?

BY MS. GREENBERGER

Q If Susanne is -- Sudan is a country affected by censorship or repression. Do you have a view on that?

A I don't have a view on that.

Q How about the Democratic Republic of Congo? Do you have a view on whether that is a country affected by censorship or repression?

A I don't have an opinion.

Q Would you agree with me that the United States in promoting democratic values has to compete with misinformation from authoritarian regimes?

A Yeah, sure.

Q And would you --

A That sounds reasonable.

Q And would you agree that China is a source of misinformation?

A I'm sure, yeah.

Q And --

A Definitely.

Q -- Russia?

A Possibly, yes.

(Deposition Exhibit Number 14 was marked for identification.)

MR. KHOJASTEH: Thank you.

BY MS. GREENBERGER

Q I'm handing the witness an exhibit marked 14 --

A Okay.

Q -- which is a portion of a federal statute, 22 U.S.C. 6202.

Are you familiar with this statute?

A A bit, yes.

Q And what is this statute?

A It's part of the IBA, correct? Am I right? Or I might be wrong. International Broadcasting Act?

Q And turn --

A Is this right? Is that what this is?

Q Let's just move on. So turning to (b)(6) --

A No, you asked if I knew --

MR. KHOJASTEH: But, listen, she doesn't -- if you're asking her --

THE WITNESS: I don't know.

MR. KHOJASTEH: -- is this --

(Reporter clarification.)

MR. KHOJASTEH: If she doesn't -- if you're showing her something and you want to start asking her questions about it and you're asking her if she's familiar with it, she's saying she doesn't know.

MS. GREENBERGER: And that's her answer.

THE WITNESS: No, no, no. It's not that I don't know. I said, is this the International Broadcasting Act? Is that what it's titled?

MS. GREENBERGER: I don't know the title of this document.

THE WITNESS: Okay. That's what I was asking. I'm not trying to be a jerk. I'm asking you. You asked if I knew what it was. I said, is this the International Broadcasting Act?

MS. GREENBERGER: I want to --

THE WITNESS: And then you got terse and said, let's move on. I need to know what I'm looking at here. Is this the International Broadcasting Act? Can we have an attorney who

does know answer?
BY MS. GREENBERGER
Q So the way depositions work is I ask questions, and you just give me the best answer you know.
A But I can't answer if I gave you an answer you didn't know, either.
MR. KHOJASTEH: And it lacks foundation anyway. So why don't you identify it for her or refer to a document that she's identified in, and she can -- at least she could frame it.
It's the work of a deposition. Don't roll your eyes about it. It's -- that's what we have to do. Look, I get annoyed by having to do it, too, but that's what --
MS. GREENBERGER: Okay. I --
MR. KHOJASTEH: -- conducting a deposition is.
MS. GREENBERGER: Thank you. I've conducted one or two in my life. I appreciate --
MR. KHOJASTEH: I'm sure you're talented. I'm just saying it's -- don't get

terse about it because she's asking for you to lay a foundation.

THE WITNESS: If I had my phone, I could check, but I don't have my phone.

MR. KHOJASTEH: No.

BY MS. GREENBERGER

Q So I'm handing you Exhibit 12, which is the International Broadcasting Act.

And I believe you already answered that you're familiar with this generally, this statute?

MR. KHOJASTEH: So this is Exhibit 12?

MS. GREENBERGER: I'm sorry. 14.

MR. KHOJASTEH: 14, yeah.

MS. GREENBERGER: 14. Apologies. Thank you.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q Now, paragraph (b)(6), do you see that?

A Shall not duplicate activities of private U.S. broadcasters?

Q That's not (b)(6).

A Sorry.

MR. KHOJASTEH: You were looking at (a)(3), Ms. Lake.

BY MS. GREENBERGER

Q And we can -- we can talk about (a)(3) as well later, but let's turn to (b)(6).

A Okay.

Q What is your understanding of the statutory requirement --

MR. KHOJASTEH: Go ahead. I'm just going to do my one objection on this, and then you'll -- you know -- we talked about this. I'll just do the one objection, and I will let you do your thing.

BY MS. GREENBERGER

Q What is your understanding of the statutory requirement that "United States international broadcasting shall include information about developments in each significant region of the world"?

And your counsel's about to have a standing objection. Go ahead.

MR. KHOJASTEH: Object to form. Calls for a legal conclusion.

Ms. Lake, to the extent that answering counsel's question discloses or reveals communications or an understanding you've obtained from communications with counsel, I'm going to instruct you not to answer --

THE WITNESS: I don't see that.

MR. KHOJASTEH: I'm going to instruct you not to answer. However, if you want to provide your understanding of the words on this page as a layperson, you're free to answer.

MS. GREENBERGER: You're required to answer, Counsel.

MR. KHOJASTEH: Sure.

THE WITNESS: B --

MR. KHOJASTEH: You're required -- I'm saying --

THE WITNESS: B what?

MS. GREENBERGER: (b)(6).

THE WITNESS: Okay. I see what it says.

BY MS. GREENBERGER

Q What do you consider significant regions of the world?

A Regions that are significant to our policy, I guess. I mean, I'm not an attorney. And I see you're trying to get me to say we should be covering news in every significant region. I think that significant regions, we're covering.

Q And what are the significant regions of the world in your view?

MR. KHOJASTEH: Same -- same objection. She's just asking about in your view --

THE WITNESS: Okay.

MR. KHOJASTEH: -- your personal knowledge --

THE WITNESS: I think --

MR. KHOJASTEH: -- as Kari Lake.

THE WITNESS: -- in my view, Iran is significant. I think that Cuba is significant. And I think China is significant.

BY MS. GREENBERGER

Q And is your view that -- what is your view as to whether Africa is a significant region of the world?

A I mean, you could say it's significant. You could argue it is, and some could argue it's not.

Q Have you reached an opinion personally as to whether it's a significant region of the world?

A No, I haven't.

MR. KHOJASTEH: Object to form. Asked and answered.

BY MS. GREENBERGER

Q You can answer.

A You can -- you may think it is. I may think it's not. I'm not saying I don't. I just haven't -- I haven't put out an opinion on that. I haven't given it a lot of thought.

Q How about South America? Have you reached an opinion as to whether that's a significant region of the world?

MR. KHOJASTEH: Again, Ms. Lake, as a layperson, not as a --

THE WITNESS: Yeah. I think there's --

MR. KHOJASTEH: -- lawyer.

THE WITNESS: -- some significance in South Africa [sic]. There's significance everywhere. There's significance on Mars.

BY MS. GREENBERGER

Q Have you reached an opinion as to whether South America is a significant region of the world?

MR. KHOJASTEH: Object --

THE WITNESS: Yes.

MR. KHOJASTEH: -- to form. Lacks foundation.

THE WITNESS: Sure.

BY MS. GREENBERGER

Q Sure, it is a significant region?

A Sure, yeah.

Q And is VOA broadcasting information to South America?

A Actually, I think Cuba broadcasting is

making it to parts of South America.

Q Which parts?

A I believe it's in either my declaration or Frank's.

Q Okay. We can come back to that.

A Yeah. I'm not sure where. You can -- that's a good question for Frank.

Q How about Central America? Would you say that's a significant region of the world?

A Sure.

MR. KHOJASTEH: And, again, object to form. Lacks foundation.

In what respect are you meaning significant nation of the world? What does that mean?

THE WITNESS: Is it significant in size? Is it significant in culture, significant in political importance, significant in import, export, significant in culture?

MS. GREENBERGER: So --

THE WITNESS: Lots of different --

BY MS. GREENBERGER

Q As your understanding of the statute, where it says significant region of the world, what is your understanding of the word "significant region"?

MR. KHOJASTEH: Ms. Lake, if you have -- separate and apart from the words "significant region," if you're -- if you're opining as to an interpretation -- your interpretation of the statute -- of the statute, not the words on the page, the statute, and that's based on communications you've had with counsel, I'm going to instruct you not to answer.

THE WITNESS: I don't have an opinion of those words in that -- in the statute, and I -- this is why I lean on my general counsel.

BY MS. GREENBERGER

Q Turning to section c, which speaks about the --

A Are we still on the --

Q Same --

A -- International Broadcasting Act?

Q Yes. Last page. It speaks -- it says, "The long-range interests of the United States are served by communicating directly with the peoples of the world by radio."

A Okay.

Q Do you have a belief as to whether the United States' interests are served by communicating directly by radio to peoples of the world?

A In some places, yes, maybe.

Q And in what places are those?

A Cuba.

Q Any other places other than Cuba where the United States' interests are served by communicating by radio?

A I haven't given it much thought.

Q And why -- why is Cuba a country where the United States' interests would be served by communicating directly with peoples of the world?

A Well, it's 90 miles from our shore, and it poses a significant threat being 90 miles from our country. And the people don't have access

to -- and some people don't have -- actually, I think I got a stat from our office down there that there's roughly 9 million people, I believe, and 8 million have smartphones. So smartphones are -- they don't have -- they don't have great electricity down there and -- radio is still listened to in some ways, but I really think smartphones are kind of where it's going. Even radio's played on digital.

Q I want to talk -- I want to turn to a different topic. We might come back to some of this, but you can put that aside.

Ms. Lake, Ms. Thomas -- I think we looked at it already -- issued a declaration or submitted a declaration in this case.

A Crystal, Crystal Thomas?

Q Crystal Thomas, yeah. And paragraph 3 of that declaration, I'll refer you to.

A Okay.

Q Let me know when you've read it.

A Okay.

Q And just so I'm clear on the math, here

it says, USAGM, as of March 27th, employs a total of 1,147 full-time employees and has active employment contracts with 598 contractors, correct?

A As of March 14th, 1,147. Yeah.

Q And those two numbers would be added together to determine the number of staff that USAGM had, correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Let me ask it another way. Are the 598 personal service contractors part of the 1,147?

A I believe they're separate.

Q Okay. I believe so, too. I just want the record to be clear.

So, when I add those two numbers up, I get 1,745. Does that sound right to you?

A That sounds good. I'd need to go back and double-check these numbers.

Q But you believe they were accurate at the time of Ms. Thomas' --

A Well, I'm --
Q -- declaration?
A -- assuming because she signed this under penalty of perjury. So she must have looked up those numbers somewhere.
MS. GREENBERGER: I think we already marked the Court's July 30th order. It's tab 27 and Exhibit 11.
MR. BLUMIN: Eleven.
BY MS. GREENBERGER
Q Do you have that in front of you?
A Exhibit 11?
Q Yes.
A There we go.
Q And the Court, on page 4 -- and this is the start of the first full paragraph -- states, "VOA's staffing levels are inextricably enmeshed with its operational capacity and, in turn, its ability to carry out its statutory mandate, because VOA cannot operate without employees."
Do you agree with that statement?
A Well, obviously, we need employees, but

the question is how many.

Q And you agree that your staffing levels are enmeshed with the operational capacity?

A Not necessarily.

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: No.

BY MS. GREENBERGER

Q So you disagree that how much -- I'll strike that.

The term "operational capacity," what do you understand that to mean? Is that a phrase you know?

A Our ability to operate.

Q And do you believe your ability to operate is connected to the number of staff you have?

MR. KHOJASTEH: Object to form. Vague as to connected.

THE WITNESS: I think the -- you're trying to ask me how many people we need to operate?

BY MS. GREENBERGER

Q I'm not yet going to the number. I'm just trying to say -- ask if you agree with the Court's statement that how many people you have and your ability to operate are enmeshed, they're connected.

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I mean, you have to have some staff to be able to operate, so I guess you could make a correlation that having staff is important to being able to operate. The question is how many staff members.

BY MS. GREENBERGER

Q And you need a certain level of staff to broadcast enough to comply with your statutory mandate, correct?

MR. KHOJASTEH: Object to form. Lacks foundation. Calls for a legal conclusion. And I'll instruct you to -- that's fine.

THE WITNESS: Can you repeat that, please?

BY MS. GREENBERGER

Q Sure. And I think this is just common sense that when we looked at the June 3rd letter and the attachments, you concluded -- or I'm sorry -- you submitted to Congress that -- I can't remember if the number's 81 or 82 -- I'll withdraw the question.

So when we looked at the June 3rd letter, you submitted to Congress that 81 people were necessary for the statutory minimum, correct?

A The -- the career staff, the career leadership, senior career leadership, determined that number.

Q And --

A And my -- and then I followed up with the CN that said this is fluctuating and we're going to be determining it.

Q And the basic idea that I don't think is controversial is, you need a certain number of people to do the broadcasting that is the statutory mandate, correct?

A You need a certain number of people, yes. The question is, what is a certain number?

Q Right. And if you have too few people, you can't do the statutory mandate, correct?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: If you have too many people, you can't do statutory minimum.

BY MS. GREENBERGER

Q But if you have too few people, you can't do what the statute obligates you to do, correct?

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: I mean, I think there's -- you could have a differing opinion. You could say, there's too few, and I could say, we got it.

BY MS. GREENBERGER

Q I hear you, but whatever the number -- you know what? Let's move on.

Now, when we were looking at

Ms. Thomas' declaration, paragraph 6 states that the agency terminated the contracts with all personal services contractors, who will be paid through March 31st, 2025.

Do you see that?

A No, I don't see that. I see placed --

Q Paragraph 6.

A In paragraph 6, placed 1,042 facility employees on administrative leave.

Q It's the next sentence.

A On March 16th, 2025, and terminated the contracts with all personal service contractors who are being paid through -- yes.

Q Okay. And --

A "The agency has retained the ability to recall employees from administrative leave to work."

Q And, ultimately, those personal service contractors did not have their contracts terminated in March, correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I'm not sure. What are you referring to?

BY MS. GREENBERGER

Q Do you recall that the temporary restraining order that the court in New York issued stayed the termination of the contractors?

A Yes.

Q Okay. And then, in May, you determined that the contractors should be terminated; is that correct?

A Somewhere about there --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- but we --

MR. KHOJASTEH: Lacks --

THE WITNESS: -- had --

MR. KHOJASTEH: -- foundation.

THE WITNESS: Yeah, I don't --

MR. KHOJASTEH: Vague as to "you."

THE WITNESS: Dates are going to be tough because I don't have a calendar in front of me.

MR. KHOJASTEH: Kari, Ms. Lake, when

I'm objecting, you have to stop --

THE WITNESS: Okay.

MR. KHOJASTEH: You have to not answer so that he -- we can get a clean record.

MS. GREENBERGER: Did you get her answer?

(Reporter clarification.)

THE WITNESS: What was the question?

BY MS. GREENBERGER

Q So the question was -- let me ask it another way.

At some point, you ordered that the contractors should be -- the personal services contractors should have their contracts terminated, correct?

MR. KHOJASTEH: Object to form. Vague as to "you."

THE WITNESS: Yes. I -- when you ask "you," I see the agency, so just so that you know that, when you're saying "you," I -- there -- sometimes this was -- if it was before, when Victor was there, there was consultation with

Victor. If it's -- if you're asking me about now, it would maybe be just me deciding that.

BY MS. GREENBERGER

Q Okay. So you said you don't know the date, but it was some date -- is it fair to say it was some date in the spring that the contractors' contracts were terminated?

A I don't know the date.

Q Okay. And was it after the injunction was issued?

A I would have to look. I'd have to go back and look.

Q Okay. And who made the decision to terminate the contracts for all the contractors?

A I think that was made through --

THE WITNESS: Is this kind of pre-decisional through our team? Can I talk about that?

MR. KHOJASTEH: No, no, you can make -- you can say who makes it.

THE WITNESS: Ultimately, if it was in March, there's a good chance that Victor -- I

would have consulted with Victor, and either Victor would have made that decision or I would have made the decision with the ability that I have.

BY MS. GREENBERGER

Q And to be clear, I'm not talking about the March decision that was ultimately rescinded. I'm talking about the later decision that actually went through that -- that were -- ended up that the contractors had their contracts terminated.

MR. KHOJASTEH: When was that, just so I can --

MS. GREENBERGER: May.

MR. KHOJASTEH: Okay.

THE WITNESS: Okay. So you're asking who made the decision?

BY MS. GREENBERGER

Q Yes. Who made the decision in May?

A It was -- it was probably me consulting with Victor, I'm guessing.

Q Well, I don't want you to guess. Is

that your best memory?

A Well, I -- yeah, I -- we -- we, as an agency, made the determination to do that --

Q And is your --

A -- and --

Q -- best memory that you made that decision after consulting with Victor?

A After consulting with the team, yeah. Victor gave me delegated authorities.

MS. GREENBERGER: You know what? Why don't we take a break now, if that's okay.

MR. KHOJASTEH: Fine with us.

THE WITNESS: I don't need one.

MR. KHOJASTEH: Yeah, but if she wants to get organized.

THE WITNESS: Oh, okay.

MR. KHOJASTEH: We've been going an hour. It helps her.

THE WITNESS: Okay.

VIDEO TECHNICIAN: This marks the end of Media Unit No. 4. Going off the record, the time is 15:30 p.m.

(Recess 3:30 p.m. to 3:48 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 5. Going back on the record, the time is 15:48 p.m.

BY MS. GREENBERGER

Q Paragraph 8, Ms. Lake, of Ms. Thomas' declaration, do you have that in front of you?

A I do now.

Q Okay. Thank you so much. Her March 27th declaration. It states that "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."

Do you see that?

A Yes.

Q And since March 27th, has the agency recalled other employees from administrative leave?

A Yes.

MR. KHOJASTEH: Object to form.

Calls -- lacks foundation.
BY MS. GREENBERGER
Q Can you describe to me the process the agency has followed since March when recalling people from administrative leave?
MR. KHOJASTEH: Object to form. Lacks foundation.
THE WITNESS: Well, when somebody's put on paid administrative leave with the United States government, you're still an employee, and you can be called back at any moment. And they know that when they're put on paid administrative leave, so they're being paid while they're at home. They still get all the benefits. And at times we determine we need somebody, and they come back. This has happened across the government, and it's quite normal.
BY MS. GREENBERGER
Q And what e-mail or memo or documentation is created about the need to return someone back from administrative leave?
MR. KHOJASTEH: Object to form. Lacks

foundation.

THE WITNESS: Usually, it will come if -- if somebody in the agency says, you know, I need somebody who can do this or we have a need for this, we need to bring somebody back, or what about bringing somebody back from admin leave, and then we go through HR, contact the person, and they come back from administrative leave.

BY MS. GREENBERGER

Q Are you -- strike that.

Have you been involved in the decision whether to recall employees back from administrative leave?

A Sometimes I've been asked if we can call employees back, or it's suggested to me.

Q And have you sometimes approved that request?

A I have.

Q And have there been other times where you have not approved that request?

A Perhaps, yes. There's probably been a few times where I haven't.

Q And what were the situations when you did not approve the request?

A We -- maybe -- there were several, being maybe there were -- there was a situation where somebody was asking for three people or four people to return back to do the same job, when we didn't think it was necessary to have four people. We could do it with two.

Q And so you personally at that point would say you think two is enough?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony.

THE WITNESS: I would interact with the person requesting four -- this is hypothetical -- four, and I would say, do we really need four? Can two do that job or three?

MS. GREENBERGER: Let's turn to a different topic. Is -- can I have --

MR. BLUMIN: It's not ready yet, but you may not need it.

BY MS. GREENBERGER

Q Okay. There were RIF notices that were

sent out by the agency between June 5th and June 20th; is that correct?

A I believe those are the correct dates.

Q Okay. And the reporting -- and I can show you tab 34 -- that is sourced to a senior official at the agency states that there were 639 people who were -- received RIF notices in June from the agency.

A Can I see this?

Q Of course. Let me mark it as an exhibit first.

THE WITNESS: What's the source of this? What agency put this out?

MS. GREENBERGER: This is TheDesk.net.

THE WITNESS: Okay. Oh, Matthew Keys. You pick all the good ones, all the good fake news. Okay.

(Deposition Exhibit Number 15 was marked for identification.)

BY MS. GREENBERGER

Q Did you see this story when it was published?

A No, I didn't see this.
Q Did you hear this story when it was published?
A I try not to read the fake news.
Q Did you hear about this story when it was published?
A What's the story? What do you want me to focus on here?
Q So my question was really pretty simple. The reporting on the second paragraph on page 2 says that "639 employees received RIF notices between June 5th and Friday afternoon."
Is that accurate?
A That seems very accurate, yeah.
Q And the next sentence says that "Among the affected employees were Persian-language workers who were laid off earlier this year, but asked to return to work last week in order to cover the Israel-Iran conflict."
Do you see that?
A "Among the affected employees" -- uh-huh.

MR. KHOJASTEH: And what's the question?

MS. GREENBERGER: I was getting there.

MR. KHOJASTEH: Sure.

BY MS. GREENBERGER

Q Is that accurate that the June RIF included Persian language workers who had been asked to return from leave to cover the Israel-Iran conflict?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I mean, you're asking me to verify Matthew Keys' reporting.

BY MS. GREENBERGER

Q I'm not. I'm asking you for facts about the agency. So what I'm trying to understand --

A Yes. Some Persian language workers who were laid off earlier this year but asked to return to work were RIF'd, yes.

Q Thank you. And you signed the RIFs that went out in June?

A Yes.

Q And you signed them because that was your decision to RIF those workers?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: We are effectuating an executive order dated March 14th by the President of the United States, which calls for reducing the agency to its statutory minimum, including personnel.

BY MS. GREENBERGER

Q And so my question was: You personally made the decision in June to RIF 639 employees, correct --

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q -- in order to effectuate the executive order?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to personal decision.

THE WITNESS: This was an agency decision based on everything that's led up to

this, that we needed to reform the agency and bring it to a statutory minimum.

BY MS. GREENBERGER

Q Why did you sign those RIF notices?

A Because Victor Morales refused to do his job and do that.

Q And did Victor Morales tell you why he was refusing to sign the RIF notices?

A I don't recall.

Q Did you have any communications with Mr. Morales about signing the RIF notices?

MR. KHOJASTEH: Object to form. To the extent that those communications happened in the presence of counsel, I'm going to instruct you not to answer. If they didn't, you're free to answer the question.

THE WITNESS: I don't recall if he just didn't feel that he wanted to do it or he just said, why don't you do it.

BY MS. GREENBERGER

Q And those 639 RIF notices were rescinded, correct?

A They were.
Q And why is that?
A I think it was because there was some sort of an error detected on a few of them, and we engaged in union bargaining, so we reissued those based on a couple of numbers that they said weren't accurate. And we decided to rerun the RIF after we did some collective bargaining with the unions.
Q And there was also a union grievance filed concerning the RIF?
A Perhaps, yes.
MR. KHOJASTEH: Object to form. Lacks foundation.
BY MS. GREENBERGER
Q Okay. I can show it to you and see if that refreshes your recollection.
A Okay. I wasn't -- I wasn't a huge part -- I mean, the RIF is done in a very specific way, and I was not a huge part of deciding on it.
Q Who was --

A What was the union grievance? May I see that?

MS. GREENBERGER: Sure. Can you hand me tab 46, please?

MR. BLUMIN: Yeah.

BY MS. GREENBERGER

Q And while we're getting that, you said you were not a huge part of deciding that RIF.

Who played a huge part in your view?

A Well, we decide which employees are needed, not which specific employees, but what do we need to do the job. And then we can't choose an employee -- you might -- in the private sector, you might say, we need our star employees to remain. That's not how it works in the government.

You just choose the titles of -- of the positions that are needed, and then it goes through a process where those positions will remain, but you're not certain who will be in those positions. It's a way to maintain fairness in the government, and so that's how it works.

Q And so when you say you didn't have a huge role, you had a role in choosing the title, but not -- of the positions that were needed, but not a role in determining who would --

A No. I let my team decide the title. I let the people who were running the Voice of America decide who -- which titles -- not who, but which titles, what positions are needed to run Voice of America.

Q And when you say you let the people who were running Voice of America decide that, who were you referring to?

A Management there, Leili and -- and I'm sure she consulted with others to say, what do we need to run our operation?

Q Remind me. What was Leili's title in June?

A I think she -- I don't know if she was -- I don't know if she had been moved into the programming director yet, so I'm not sure, but she was probably the top manager in the newsroom.

MS. GREENBERGER: And once there were -- well, we can get there. Can you please mark that?

(Deposition Exhibit Number 16 was marked for identification.)

THE WITNESS: Okay.

MR. KHOJASTEH: What is this marked as?

MR. BLUMIN: I'm so sorry.

MR. KHOJASTEH: It's okay.

MR. BLUMIN: I think we're at 16.

MR. KHOJASTEH: Okay. And what was this one, just so I'm --

MS. YEOMANS: 15.

MR. BLUMIN: That was 15.

MR. KHOJASTEH: Okay. Great. Thank you.

BY MS. GREENBERGER

Q And let me know when you're ready to be asked questions. And I can just tell you, I'm not going to ask such specific questions, so...

My question will be -- when you're ready is: Does this refresh your recollection

that one of the unions, AFGE, filed a grievance concerning the June RIFs?

MR. KHOJASTEH: And that's a yes or no question, Ms. Lake. To the extent that you learned about this document or learned about the grievance from counsel, I'm going to instruct you not to answer as it would disclose attorney-client --

THE WITNESS: Yeah, I learned --

MR. KHOJASTEH: -- communications.

THE WITNESS: -- from counsel, and this kind of thing goes through our HR people that deal with the unions.

BY MS. GREENBERGER

Q And so in -- in or about the time the grievance was filed, you were aware of it, correct?

A The grievance on July 29th?

Q Correct.

A I'm sure they made me aware that there had been a grievance. We -- we expected this. You know, this is not unusual to have a grievance

when you're going through a RIF.

Q And that's because the CBA has a process for dealing with RIFs, correct?

A Right.

Q And there's also a process to deal with the grievances?

A Uh-huh.

Q You have to say yes or no.

A Yes.

Q Now, in August, on August 29th, at that point, you were acting CEO?

A Yes.

Q And you can put that aside.

You directed a RIF of 532 employees; is that correct?

A Uh-huh. Yes.

Q And just so the record's clear, when I say you, I mean you personally directed that.

MR. KHOJASTEH: Okay. Object to form. Lacks foundation. Vague as to "you," but go ahead.

THE WITNESS: I mean, the original RIF,

we're planning to reduce the force, the number of people, right? That was pretty obvious. We decided to rerun the RIF. During that time while we were rerunning it, we were -- before we reran it, we started negotiating with the unions. And I think we had great negotiations from all I heard. They asked for, at one point, 42 different items that they requested, and I think we delivered on -- out of 42, I think we delivered on 39, maybe even 40.

And then we always planned to rerun the RIF, and so this was just a rerunning of the RIF, and that's how it happened. So this was the same -- the same process that went into the first one. We knew we had to reduce the size of the staff because we were effectuating the President's March 14th executive order, so this was that process continuing out.

BY MS. GREENBERGER

Q And just so I'm clear, when you say you had to rerun the RIF, you're referring to the June RIF, correct?

A Yes.

Q Okay. And you said you had negotiations with the unions and at the -- on August 29th, when you reran the RIF, had those negotiations been completed, or were they ongoing?

MR. KHOJASTEH: Object to form. Calls for -- lacks foundation.

THE WITNESS: I think we felt that they were -- they had -- we had completed the -- I'm not sure the union's happy, but, you know, that's their prerogative as well.

BY MS. GREENBERGER

Q Did you consult with OPM on the decision to issue the RIF notices on August 29th? And here, when I say "you," I mean to your -- let me ask it a different way.

To your knowledge, did the agency consult with OPM on the decision to issue the RIF notices on August 29th?

A I don't know that. If it's part of what we need to do, then I'm assuming we did.

Q And who in the agency as a matter of general practice would have been tasked with coordinating with OPM?

A Probably --

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I don't know. Probably -- probably our LER at HR, maybe Michelle Stewart, perhaps somebody -- we had several HR people that were working on conducting the RIF. And possibly Chris Luer, who's our acting CMO. I think he's our acting CMO. Maybe he's acting head of HR, actually.

BY MS. GREENBERGER

Q We talked earlier about the process of a RIF. Who made the decision who would be -- as to the names of the human beings who would be on the retention register?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I think I just told you you don't choose the name. You just choose a

position.
BY MS. GREENBERGER
Q And who chooses the name, though, or what's the process by which a name is chosen?
A The process -- and I went through this --
MR. KHOJASTEH: Object to form and instruct you not to answer to the extent that your knowledge of the process is based on communications you've had with your lawyers.
THE WITNESS: That's true, and it's also based on communication with people who were involved in the RIF.
MR. KHOJASTEH: So you can --
THE WITNESS: So it's hearsay.
MR. KHOJASTEH: Don't -- you don't have to worry about hearsay. Your -- whatever you learned from the people involved in the RIF that aren't the lawyers, you can --
THE WITNESS: Okay.
MR. KHOJASTEH: -- you can communicate -- you can testify as to that. On

that stuff you learned from lawyers, I'm instructing you not to answer.

THE WITNESS: Okay. So repeat the question if you don't mind.

BY MS. GREENBERGER

Q Sure. What was the process --

A Of choosing the people that were RIF'd?

Q -- of choosing the people that were RIF'd?

A I think I already went through this before. It's the same as with the first RIF. We just reran the RIF, and you determine --

Q You said you chose the titles, so I'm asking --

A I didn't choose the titles.

Q The agency chose the titles?

A Yes.

Q And then how did it come to be that --

A The agency -- people in the agency.

Q How did it come to be that specific people were on the retention list?

A Well, what happens from the way I

understand it -- and, again, I wasn't involved in the nitty-gritty on this. This was done through people in HR, the unions. There's a very, very specific way that a reduction in force plays out, and we wanted to follow every single rule and not miss one line of it.

We asked our, you know, team members who are running the VOA -- this is the way I understand it went -- who do you need to -- not who, not specifically who, but what positions do you need to do the job, to do the programming that we need.

And a list of positions was given, and then they decide to not have -- they decide to reduce in force the other positions that aren't needed. But let's say you fall in one of those lines. Let's say you're a radio broadcast technician, and you happen to be a GS-14, and you may be working doing the radio -- doing the news. And once your position gets RIF'd -- I'm sorry -- if your position gets saved and somebody else's position got RIF'd who's higher than your GS

level, then they call a bump and retreat. That person can come in and take your job.

So it's a very complicated process that the people who -- Leili may have said, we need these positions, and maybe, you know, just for hypothetical's sake, maybe John Doe was in one position, and she wanted to keep that title. That doesn't mean John Doe's going to remain in that, because there could be somebody who has seniority over him who will end up -- who was RIF'd who will end up taking that job. So it's not picking individuals. It's picking titles.

Q And are there e-mails or memos or other documents that reflect how the agency decided what positions to eliminate or retain with the --

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q -- as part of the RIF?

MR. KHOJASTEH: Lacks foundation.

MS. GREENBERGER: I said "are there."

THE WITNESS: I don't know how --

MR. KHOJASTEH: You didn't say -- ask

her whether she knows whether there are.

THE WITNESS: Do I know whether there were? I don't know whether there were. I was not involved in that.

BY MS. GREENBERGER

Q We talked earlier about the agency's surge capacity, right?

A Uh-huh.

Q And I think we talked about how many of the agency's journalists have specialized language or subject matter skills.

Would you agree with that?

A In some cases.

Q And many of the people who -- is it fair to say that many of the people who were RIF'd on August 29th have specialized language or subject matter skills?

A I mean, yeah, specialized language, a lot of people speak these languages in America.

Q A lot of people speak what languages in America?

A Farsi. It's a big country.

Q And one of the things you said earlier is that the agency could hire contractors to deal with surge capacity issues, correct?

A Yes.

Q And is there any e-mails or memos or other documents about how long they would take or the process the agency would have to go through to hire contractors for surge capacity?

A I think you asked me that before we took a break. I'm unaware if there are.

Q Okay.

A Frank might know that.

MS. GREENBERGER: Can I have 35, please? Can you mark this, please?

(Deposition Exhibit Number 17 was marked for identification.)

BY MS. GREENBERGER

Q And I just showed the witness Exhibit 17, which is a tweet that it looks like you sent on August 29th.

A Uh-huh.

Q Is that correct?

A Yes. Yes.

Q And in this tweet, you're talking about the August RIF, correct?

A Correct.

Q And you state that this RIF will, quote, likely -- "will likely improve its ability to function and provide the truth to people across the world who live under murderous Communist governments and other tyrannical regimes."

A Yes.

Q And do you agree with me that it's important that VOA broadcast to people in Communist regimes?

A In some, yes.

Q In what? I'm sorry.

A In some, yes.

Q And what countries are controlled by Communist governments?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q To your knowledge.

A I mean, we could -- we could talk about China. Let's start there. I mean, I could go down the list of countries. I'm not interested in doing that. It's pretty obvious. You can Google it.

Q Well, I'm trying to understand your knowledge based on the decision we're talking about here.

What countries other than China are controlled by Communist governments?

A China.

Q Are you aware of any countries other than China that are controlled by Communist --

A It didn't say --

Q -- governments?

A It didn't say in my tweet, its ability to function and provide the truth to all Communists. It said, "murderous Communist governments."

Q What are non-murderous Communist

governments?

A I don't know.

Q Okay. Are you aware of any Communist governments others than China?

A I would argue that Cuba is Communist. I would argue that a lot of socialist countries are Communist. Venezuela.

Q Okay. So other than the three countries you just named, are you aware of any other countries that are --

A Yes.

Q -- Communist --

A There are many. There are many.

Q And I'm asking for which ones those are.

A I'm not going to go down and list all the countries. You can Google it right now.

Q I'm asking for your knowledge, Ms. Lake. Please let me know --

A I can't recall right now.

Q Okay. So your testimony is that the only countries that you are aware of --

A No, I didn't say that. I said I can't recall. I didn't say the only countries are. I said I can't recall all of them at this moment.

Q And I'm not asking you whether you recall all of them. I'm asking whether -- please don't interrupt me. I'm asking whether you recall whether there's any countries other than China and Cuba -- and you also named Venezuela -- that are controlled by Communist governments.

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I would throw in a lot of socialist countries, too, but we could disagree on that. But I've listed several, and I -- at this moment, I don't recall.

BY MS. GREENBERGER

Q Okay. Are you aware that Vietnam is controlled by a Communist --

A Yeah.

Q -- government?

A I'm aware of that.

Q And are you aware that North Korea is

controlled by a Communist government?

A Yes.

Q And are you aware that Laos is controlled by a Communist government?

A Yes.

Q And does VOA have any plans to broadcast to Laos?

A No.

Q And how about to Vietnam? Does Vietnam --

A Nope. Nope. No.

MS. GREENBERGER: Turning to tab 30 -- oh, sorry. Let me see. Have we already marked this 8/28 notice, which is tab 38?

MR. BLUMIN: No.

MS. GREENBERGER: Okay. So I'm going to show you the notice that your attorneys filed on the court docket on 8/28 about the RIFs.

THE WITNESS: Okay.

MR. BLUMIN: We could use a stapler.

MS. YEOMANS: Stapler?

MR. BEATON: I can get one.

MR. BLUMIN: Should we just fold it?
MS. GREENBERGER: Sure.
(Deposition Exhibit Number 18 was marked for identification.)
MR. BLUMIN: We can pass the stapler around. Sorry for this.
MR. KHOJASTEH: We'll live.
MR. BLUMIN: We'll pass a stapler around.
BY MS. GREENBERGER
Q And I'm handing the witness an exhibit marked 18, which is notice filed on the court docket on August 28th.
A Okay.
Q Have you seen this document before?
A I don't know if I have.
Q Sure. Take your time.
A Let me put my eyeballs on it.
Q Please do.
MR. KHOJASTEH: Counsel, was your last question, have you seen this document before?
MS. GREENBERGER: Yeah.

MR. KHOJASTEH: Okay. Has Ms. Lake answered yet?

MS. GREENBERGER: No.

MR. KHOJASTEH: Okay.

THE WITNESS: I may have seen this come across my e-mail. Just reading it to be familiar with it.

MS. GREENBERGER: I'm just taking it from you to staple it.

THE WITNESS: Okay.

MR. BLUMIN: Yeah, don't want to staple you.

MS. GREENBERGER: Thank you.

MR. KHOJASTEH: Thanks.

BY MS. GREENBERGER

Q There you go, just because there's a lot of paper in front of you.

You'll see on the second page -- I'll show you where it is on my document. It might help if you just look over. Around here.

A Was this filed before the RIF or after the RIF?

Q Well --
A I've got to look at the date here.
Q Yeah. Why don't you look at the dates?
A 29th. So -- okay. It looks like it was filed before the RIF; is that right?
Q It was filed on August 28th. You have the docket stamp on top.
A Okay.
Q And on the second page it says, "USAGM plans to retain 158 employees, and VOA to retain 108 employees."
Do you see that?
A No, I don't. Where -- where are we?
Q Do you see where my finger is? That's the easiest way.
A "The Agency notes that these numbers could change slightly."
Q Right. The sentence two sentences above that.
A USAGM plans to issue reduction in force, yes. Retain 158 employees. VOA retain 108 employees, yes.

Q And of those 108 employees who will remain employed, how many will remain on leave?

A I don't know that we've determined that yet.

Q Do you know how many are on leave right now?

A No.

Q Roughly?

A No.

Q Okay.

A I don't.

Q And the sentence says that USAGM plans to retain 158 employees.

So, just so I understand, those 158 are not content producing staff, correct?

A I don't know. You'll have to ask Leili that.

Q Okay. Am I right that those are administrators, or you don't know?

MR. KHOJASTEH: Object to form. Asked and answered.

BY MS. GREENBERGER

Q You can answer.

A Well, some of them could be employees at OCB, members of our back office, HR, people who run things like transmission lines and transmission towers and that kind of thing.

Q Apologies if I've already asked this. Do you -- have I already asked you, of the employees that will remain after this RIF is effectuated, how many will speak Farsi?

A I don't know. That's a great question for Leili.

Q Would you agree with me that after these RIFs are effectuated, USGM -- USAGM will not be able to spend the congressional appropriation at levels approaching the prior year?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Are you asking if we'll be able to spend the money that was appropriated -- or if we've already spent it or

if we'll be able to? Clarify that if you would.
BY MS. GREENBERGER
Q Sure. Let me do some preliminary questions.
Is it fair to say that a significant portion of the agency's budget goes to personnel?
MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "significant portion."
BY MS. GREENBERGER
Q You can answer.
A Yeah, what is a significant portion?
Q Well, do you have a rough sense of what portion of the agency budget goes to personnel?
A I would -- I would sense that a significant portion goes to people, yeah.
Q And many of those people are now being terminated, correct, under the RIF?
A Yes.
Q And so the portion that had been going to personnel, that significant portion, would not be going to personnel once the terminations go into effect, right?

A The terminations go into effect, I believe, on the 30th of September. Is that about right, roughly? That's what I -- that's what I believe to be about the date, which is the end of the fiscal year.

Q So if Congress passes a continuing resolution that continues the current fiscal year spending into next year, a significant portion of that budget would not be being spent on personnel because they're being terminated, correct?

MR. KHOJASTEH: Object to form. Calls for speculation. Hypothetical and lacks foundation.

THE WITNESS: It's hypothetical.

BY MS. GREENBERGER

Q Well, does the agency have any plan for the spending of its appropriation if it won't be spending that money on the significant costs that are personnel?

MR. KHOJASTEH: Object --

THE WITNESS: We --

MR. KHOJASTEH: -- to form. Calls for

speculation. Lacks foundation.

THE WITNESS: I'm not going to, you know -- I don't have a crystal ball. I don't know what Congress is going to do. I'm not sure Congress knows what Congress is going to do. But our fiscal year ends on the 30th of September, and that is when these employees will be off the payroll.

BY MS. GREENBERGER

Q And you're saying the agency has not given any planning to the impact of a continuing resolution for the next fiscal year. Is that your testimony?

MR. KHOJASTEH: Object to form. Lacks foundation and mischaracterizes the testimony.

THE WITNESS: Yeah. I just said I'm not going to do hypotheticals. I don't know. I mean, they could pass a budget.

BY MS. GREENBERGER

Q Absolutely, they could, and my -- earlier, we had talked about -- well, strike that.

Part of good planning is to plan for different outcomes. Would you agree with that?

A That's right. That's why we're planning all kinds of things, making sure that we're ready just in case. We've got contingency plans.

Q Exactly. And is one of the contingencies that the agency is planning for a continuing resolution?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I don't want to get into a hypothetical. We don't know what Congress is going to do. We're hopeful that they will pass with the -- with the majority in the House and the majority in the Senate and an incredible, amazing president like Donald J. Trump and The White House, that we can get something resolved here.

BY MS. GREENBERGER

Q And the plan is that if your budget justification goes through, you would then wind

down the agency, correct?

A Well, we --

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "wind down."

BY MS. GREENBERGER

Q Sorry. You can answer.

A With a -- with a reduced staff, we don't need close to a billion dollars at the agency to -- and we're trying to save the taxpayers dollars.

Q Okay. You can put that aside.

Are you aware that the plaintiffs had filed with the Court papers about the defendants' noncompliance with Part III of the PI?

A Remind me --

MR. KHOJASTEH: It's a -- object to form. It's a yes or no question. She's not asking you what you know about it, X, Y and Z. She's just asking you, are you aware, yes or no.

Anything -- I'm safe to say this. Anything you know about that filing is based on conversations you've had with the DOJ --

THE WITNESS: That's right.
MR. KHOJASTEH: -- or your lawyers.
THE WITNESS: That's right.
MR. KHOJASTEH: Instructing you not to answer. You can ask the yes or no, though, whether she's aware.
MS. GREENBERGER: I did ask it.
MR. KHOJASTEH: I know. I have to give the instruction.
MS. GREENBERGER: Yeah, fine.
THE WITNESS: There's been -- I think we have five malicious lawsuits against us, and there's been a lot of, you know, things that come through, and the attorneys brief me on them.
BY MS. GREENBERGER
Q Do you know, yes or --
A So I don't know if it's -- if I look at it, perhaps I might be able to tell you for certain yes or no.
Q Okay. Were you aware, yes or no, that on June 23rd, the Court held a hearing regarding defendants' alleged noncompliance with the

Court's preliminary injunction, Part III?

A Yes.

Q Okay. And are you aware that at the end of that hearing, the Court ordered defendants to file a supplemental memorandum with certain additional information?

A I believe I am aware of that, yeah.

MS. GREENBERGER: And can you hand me tab 25, please?

(Deposition Exhibit Number 19 was marked for identification.)

BY MS. GREENBERGER

Q And I'm going to show you the Court's order, which is dated June 23rd, and my question will just be -- well, my first question will be: Were you aware of that order?

I'll show it to you.

A Every time I take these off, you make me put them back on.

Q I would show you less documents, but you say, can I see the documents.

A Well --

Q So the question's just: Were you aware of this order?

MR. KHOJASTEH: Yes or no, Ms. Lake?

THE WITNESS: I'm sure that I was aware of it. I mean, am I -- I'm not overly familiar with every detail on it.

BY MS. GREENBERGER

Q And did you do anything promptly -- well, strike that.

Did you do anything in response to this order that is Exhibit 19, the June 23rd order?

MR. KHOJASTEH: Object to form. I'm going to instruct the witness not to answer beyond -- you can say yes or no whether you did something. You can't say what you did.

If it was -- you can't say what you did if it was done at the direction of counsel. Sorry. Apologies.

THE WITNESS: Okay. We did something, but it was at the direction of counsel. You asked if we did anything? Is that the question you asked?

MS. GREENBERGER: That was the question.

MR. KHOJASTEH: She asked if you did something.

THE WITNESS: Oh, if I did something?

MR. KHOJASTEH: I mean, if we want to take a quick -- I may know where you're going with this, but I have to make these objections. I have no idea what's going to -- I want to make sure we're not breaching the attorney-client privilege or work product.

MS. GREENBERGER: Okay. I'm going to say I don't agree with that objection, but why don't we move on --

MR. KHOJASTEH: No, no, I'm just --

MS. GREENBERGER: -- because --

MR. KHOJASTEH: -- letting you know that I'm happy to revisit the objection with just some more clarity of where you want to go with that. And we can do that off the record like we've done earlier today, and I've been able to help you in terms of getting the information

you're looking for for your examination.

MS. GREENBERGER: Let's -- let's turn to the Court's next order, which is on July 8th. And tab 26, if you could get that for me, please. I'm sorry. July 8. Yeah. Did I say July 8?

(Deposition Exhibit Number 20 was marked for identification.)

MR. KHOJASTEH: This is 20?

MS. GREENBERGER: What are we up to?

MR. BLUMIN: Yes.

BY MS. GREENBERGER

Q So I'm showing the witness a document marked Exhibit 20, which is a July 8th court order. And my question is: Have you seen this document before?

A I know that you live and breathe all of this and you all collect a lot of billable hours on this, but I'm running an agency, so some of this just blends together, and I rely on my attorneys.

Q I hear you. And the answer, it's a yes, no, I don't know question.

A I'm not sure. I probably am aware of this, yes.

Q And were you aware that the Court said that it does not -- I'm turning to the third page. "The Court still does not have a clear picture of what VOA is doing, what the defendants' plan is for VOA moving forward, or how the defendants made any of these decisions."

Were you aware of that?

A Yes. I think that's why we're here today, right, spending so much quality time together. It's wonderful.

Q Turning to the first declaration that you submitted to the Court after this July 8th order, which is exhibit -- which is Exhibit 2, somewhere in that pile.

A Let me find it. I should put these in order, perhaps.

Q Yeah, let's do that on the next break.

MR. KHOJASTEH: What do you mean, next break? No, I'm just kidding.

THE WITNESS: Oh, 2. Is that what you

said, 2?

MS. GREENBERGER: Yes.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q Okay. Now, on paragraph 4 of your declaration, you told the Court that VOA has 72 full-time employees; is that correct?

A Looks like it, yeah. 72, that's what it says.

Q And my understanding -- and correct me if I'm wrong -- is that you did not -- you personally did not understand that 72 was the statutory minimum, correct?

A Pardon me?

Q The 72 number that you put in your declaration to the Court, you did not understand that to be the statutory minimum?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. I think the statutory minimum's been in reference to USAGM and not VOA.

BY MS. GREENBERGER

Q The statutory minimum you listed in VOA was 11, correct, in your letter to Congress?

A In the letter to Congress, we -- we -- "While we anticipate being above the originally proposed statutory minimum staffing numbers, the plan to effectuate President Trump's Executive Order is still developing. As we work to adhere to the executive order, please consider this required Congressional Notification."

Q Right. I was turning to the next page of that.

A Okay. The recommendation?

Q Yes.

A And your question is on that?

Q Yeah.

A What was your question?

Q My question was: Am I understanding correctly this document that the statutory minimum was calculated -- I'm sorry -- was determined to be 11 people as compared to the 72 people that you told the Court on July 18th that

you were employing?

MR. KHOJASTEH: Object --

BY MS. GREENBERGER

Q Is that apples to apples or not?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "apples to apples."

BY MS. GREENBERGER

Q You can answer.

A We're developing the plan to run the agency. We're running the agency, and we're utilizing information given to us by senior career leadership who helped devise this plan. I thought it seemed very low, and I even mentioned that it was a little bit -- or it seemed low, and I had mentioned in the letter that we were seemingly going to go above that. We anticipate being above the originally proposed statutory minimum.

Q When you -- just so the record's clear, when you said it seemed low, you were referring to the March 18th statutory minimum memo, correct?

A Yeah. I was kind of surprised by it.
Q And you were surprised by it because the numbers were so low?
A No. I just was surprised by it.
Q Well, what were you surprised by?
A It was just surprised.
Q What about it surprised you?
A I thought that -- I just thought that the careers wanting to eliminate 90-plus percent of their colleagues was a bit shocking. But I understand they understand this -- how this agency works and that they know better because they've been working in this agency for a long time. And many -- most of them are SESs, which tells me they're extra special and extra important when it comes to the federal government for the skills that they have, so they truly are the cream of the crop.
Q And so you expected the statutory minimum number to list more than 81 people, correct?
A I didn't know what it was going to be.

Q But you were surprised that the number -- that, as you said, 90-plus percent of people would be terminated?

A No. I was more surprised that why would you have so many people there to start with, but then I realized that it's the government. And I worked in media for 30 years as a journalist, a broadcast journalist, and over that time, every single news operation across this country has been right-sized as technology has picked up, but not the federal government.

They just kept growing and growing and growing and adding and adding and adding and then adding contractors on top of it. And it makes sense. It's not their money. It's the hardworking people across the country paying for this. So I was more shocked at what we had before when we could do it with such a small amount.

Q In the Court's July 8th order, which I believe you have in front of you --

A 18th. There we go. 19, Exhibit 19?

Q No. Docket 126 on top.
A Oh, here it is.
Q Okay.
A No, wait. That's weird. What is it?
Q This is --
A Oh, 20. Okay.
Q Do you see on page 4 the Court says, "the supplemental memorandum contains no information on how the defendants determined the activities it would undertake to restore VOA programming such that USAGM fulfills its statutory mandate"?
A Which paragraph was that, pointing it out here?
Q Right there, the paragraph -- the sentence starting with "Furthermore."
A Okay.
Q Did you address that issue in your July 18th declaration?
A I feel that we did address everything. I think we've addressed this several times.
Q Okay.

A Same questions are asked, and we keep readdressing them.

Q Can you just point to what paragraph in your July 18 declaration describes how the defendants determined which -- the activities you would undertake to restore VOA programming such that it --

A Maybe I don't understand what he's asking. What do you make of that? What is how the defendants determined the activities that would undertake -- they would -- maybe I don't understand that. What is he asking there? Because I feel that we've answered these questions over and over.

Q So I just wanted to understand what paragraph of your July 18th declaration answers that question or that request from the Court.

A Okay. How we are -- to restore VOA programming such that it fulfills the statutory mandate. So statutory mandate is the critical thing there.

Well, one of the things we're doing is

actually covering the statute that we need to, which is, you know, the VOA 50 states initiative. That wasn't even --

Q I'm sorry. The question was what paragraph in the --

A Eight.

Q -- declaration?

A It's one of the -- one of the answers. And six and seven. Paragraph 6, 7, 8.

Q Do you believe paragraph 6, 7 and 8 discusses how you made the determination about what activities you would undertake -- the agency would undertake?

A I mean, I don't know what you mean, how. Do we sit around in a circle and talk to each other? What do you mean by how? What are you -- what are you getting at?

MR. KHOJASTEH: To the extent -- I'm going to object to form and just caution counsel to the extent -- at this stage, Ms. Lake has testified that the -- the plan for statutory minimum was developed --

MS. GREENBERGER: Sir, I think you're starting to make speaking objections.

MR. KHOJASTEH: I'm just -- I'm explaining there's a privilege call here.

MS. GREENBERGER: Okay.

MR. KHOJASTEH: The how --

MS. GREENBERGER: She answered --

MR. KHOJASTEH: How it was --

THE WITNESS: Yeah.

MR. KHOJASTEH: The plan for statutory minimum was developed by general counsel's office and career -- career folks. If you want to get into the how, you're literally asking for attorney-client --

MS. GREENBERGER: No. I was --

MR. KHOJASTEH: -- communications and work product.

THE WITNESS: I think I've said how in talking about the three-page memo that senior career officials from the agency put together. It may not have been satisfactory to the judge, but I can't squeeze blood out of a turnip. I'm

telling him how, and he just doesn't like the answers.

BY MS. GREENBERGER

Q Now, in your July 18th declaration, paragraph 13 -- why don't we turn to that.

A What paragraph? 18?

Q 13, which is good because there is no 18.

And this is -- well, why don't you read the paragraph and then we can ask. Let me know when you're ready.

A Yeah, I'm ready.

Q And in this paragraph, paragraph 13 of your July 18th declaration, you're discussing why USAGM has decided not to broadcast into Africa, correct?

A Uh-huh. Yes. Yes.

Q And one of the factors that you point to is that the statute's broadcasting principles require that VOA not duplicate the activities of private broadcasters or government broadcasting of democratic nations, correct?

A Correct.
Q And you point to the fact that CNN International already broadcasts into Africa, correct?
A As does, I believe, OAN and Fox, ABC, CBS. They have a reach that reaches into Africa.
Q And your declaration didn't mention OAN, Fox, ABC --
A No.
Q -- or CBC -- CBS?
A No, but it gives you the idea that there's already broadcasting going in.
Q And -- and CNN, I think you already said earlier in this deposition, you view as not a credible news source --
A Well, it's my --
Q -- is that correct?
A -- opinion. I think it's garbage, trash, the worst of the worst, but some people love it. Some people enjoy it.
Q And do you believe that VOA should not be doing broadcasting if there's already trash

broadcasting in that space?

A Well --

MR. KHOJASTEH: Object to form.

THE WITNESS: It's not my style of news, but other people love it. So it's in news -- it's in airports and -- you might love it. I don't really care for it. I'm sure you -- you maybe don't like other outlets that I actually might like.

MS. GREENBERGER: Now --

THE WITNESS: Difference of opinion.

BY MS. GREENBERGER

Q Now, CNN broadcasts only in English, correct, CNN International?

A I don't know.

MR. KHOJASTEH: Object to form.

BY MS. GREENBERGER

Q To your knowledge, are you aware of any language other than English --

A Yes.

Q -- that CNN --

A Spanish.

Q Okay. And are you aware of any language other than English and Spanish that CNN International broadcasts in?

A I think through subtitles you could call broadcasting -- if it's in another language, say, French, they would put subtitles on, which is a possibility. I've seen that, but I'm not certain.

Q And how about OAN, Fox, ABC, CBS? Do any of those broadcast in languages other than English, to your knowledge?

A I'm just looking at the International Broadcasting Act, (a)(3). Broadcasting standards. United States international broadcasting shall not duplicate the activities of private U.S. -- United States broadcasters. I don't think it said in any language on there.

Q And so is your understanding, personal understanding of that provision, that it is duplicating broadcasting even if VOA is providing broadcasting in a nation's language; whereas, the American broadcast is in only English? It's

still duplication in your view?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Well, I would never want to rely on just my opinion. I'm -- I'm a broadcast journalist, yes, but I'm not an attorney, and so I rely on my attorneys. And I don't want to get into the conversations I've had with my attorneys to determine which languages the agency is covering and which ones we're not. That would go against attorney-client privilege.

BY MS. GREENBERGER

Q Well, you said in your declaration that because CNN International already broadcasts into Africa, you view that as duplicating -- you view USGM -- sorry. Strike that. Let's start again.

You stated in your declaration that USAGM decided not to broadcast into Africa because that would duplicate the broadcasting of CNN International and other U.S.-based news networks, correct?

A That's what it says, yeah.

Q And --

MR. KHOJASTEH: Object to form. Mischaracterizes the documents.

BY MS. GREENBERGER

Q And you reached that determination -- strike that.

You -- you believe it's duplication of broadcasting regardless of what language VOA was broadcasting in and what language the private United States broadcasters are broadcasting in, correct?

A I just said that I was reading the International Broadcasting Act, and it said not -- "shall not duplicate the activities of private United States broadcasters." It didn't say what language.

Q Was the -- was the decision that broadcasting in Africa would be duplicative of major news network broadcasting a decision of the agency that you adopted as the deputy CEO or the acting CEO?

MR. KHOJASTEH: Object to form. Lacks

foundation.

THE WITNESS: We relied on career senior staff to come up with a plan, and we've been working roughly from that plan in conjunction with our -- our general counsel helping us determine what is the statute.

BY MS. GREENBERGER

Q The Court's July 8th order, which I think you have in front of you at 4, says --

A Page 4.

Q Yeah. And the third sentence down says, "The Court therefore does not have a sense of how the defendants are using the 260 million that has been appropriated for VOA for Fiscal Year 2025," correct?

A Where do you see that? Oh, right up at the top. "The Court therefore does not have." Okay.

Q And turning to your July 18th declaration, you address this, I believe, in paragraph 12. Please confirm that I'm right on that.

A Paragraph 12? Okay. Yeah, I see that.
Q And paragraph 12 provides a list of spending by VOA office?
A Yes.
Q And in there you say that VOA, for example, spent 137 million on regional broadcasting operations, correct?
A Yes. That's what it says.
Q And that 137 million was not spent actually producing regional broadcasting operations because there was almost no regional broadcasting happening, correct?
A I don't think --
MR. KHOJASTEH: Object to form. Lacks foundation.
BY MS. GREENBERGER
Q Go ahead.
A It doesn't say regional broadcasting operations producing programming.
Q So most of that 137 million was spent on journalists and staff salaries who were on leave, correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: Paid administrative leave? I'm assuming some of that was, yes.

BY MS. GREENBERGER

Q Most of that?

MR. KHOJASTEH: Same objection.

BY MS. GREENBERGER

Q To your knowledge.

A I'm assuming, yeah.

Q And that's not mentioned in your declaration, is it? Or show me where it is.

MR. KHOJASTEH: What's not mentioned?

MS. GREENBERGER: That most or some of that money is being spent on paid administrative leave.

THE WITNESS: It just says what the -- it just says studio and production operations, yeah.

BY MS. GREENBERGER

Q So it's not mentioned, correct?

A What?

Q Your declaration does not mention how much of the money is spent on people sitting at home?

A Are you suggesting we don't pay people, we just let them go and don't pay them?

Q Not at all. I'm --

MR. KHOJASTEH: So what are you -- what are you -- are you asking her to testify what's in the document or not in the document?

MS. GREENBERGER: Correct. I'm asking her --

MR. KHOJASTEH: Okay.

MS. GREENBERGER: -- to verify --

MR. KHOJASTEH: So, like, we're out on five? Come on.

MS. GREENBERGER: I am.

MR. KHOJASTEH: Move it along.

MS. GREENBERGER: I was moving along.

MR. KHOJASTEH: All right. Go ahead.

MS. GREENBERGER: Actually, I had moved -- I think that was an offensive statement.

MR. KHOJASTEH: Just come on. That's -- does it say this and this? Either it says or it doesn't.

MS. GREENBERGER: And she might tell me I missed it.

MR. KHOJASTEH: Do you believe that?

MS. GREENBERGER: Can I have tab 27, please?

MR. BLUMIN: Sure.

BY MS. GREENBERGER

Q You understand -- well, do you understand that the Court issued an order to show cause in this case on July 30th?

A I think we already asked that -- asked that question, right?

Q We were talking about an earlier order a few minutes ago.

A Another show cause?

Q Well, the earlier order was not styled as an order to show cause. So there was a July 30th order that was called the order to show cause.

A I'm not an attorney.
Q I understand. Did you understand that the Court issued an order on July 30th? And that's Exhibit 11. I think we have looked at it.
MR. KHOJASTEH: Yeah, it's already in here somewhere.
MS. GREENBERGER: It is in here.
BY MS. GREENBERGER
Q Do you have that in front of you? Thank you.
A Somewhere. This is like malicious, insane lawfare. This is what the American people are so sick of.
Q Ms. Lake, I have -- I'm trying to move through this.
A I know you are. And let me -- let me sort through the insanity. Which one was it again? Dated what date?
Q It's July 30th. It's document 130.
A Eleven pages?
MR. KHOJASTEH: It's Exhibit 11.
THE WITNESS: Got it. What does show

cause mean? You're a lawyer.

MS. GREENBERGER: I'm happy to answer that question, but I think your lawyer would probably prefer that he be the one to advise --

MR. KHOJASTEH: Just --

MS. GREENBERGER: -- you on that.

MR. KHOJASTEH: Just -- just out of curiosity, if this is going to be another, like, 20, 25 minutes of questions, can we just take a two-minute break? No one needs to move. I just need to run to the restroom.

MS. GREENBERGER: Sure. Why don't we take --

MR. KHOJASTEH: Do you want to take more than that? It's been an hour, so --

MS. GREENBERGER: Yeah, sure. Why don't we take a break.

MR. KHOJASTEH: Okay.

MS. GREENBERGER: We can take a ten-minute break.

VIDEO TECHNICIAN: This marks the end of Media Unit No. 5. Going off the record, the

time is 16:49 p.m.

(Recess 4:49 p.m. to 5:07 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 6. Going back on the record, the time is 17:07 p.m.

BY MS. GREENBERGER

Q Ms. Lake, prior to the break, we were looking at the Court's July 30th order, which was Exhibit 11 in front of you.

A Okay.

Q And turning to the last page of that order, you see that it says, "Produce all documents otherwise relating to the defendants' plan to wind down USAGM's operations"?

A Okay.

Q And do you understand that the agency ran a search for responsive documents as a result of the Court's order?

MR. KHOJASTEH: I'm going to object to the question and instruct the witness not to answer anything you know about our compliance with this order. Our collection of documents in

response to this order was -- is based on client -- attorney-client communications.

MS. GREENBERGER: Did -- was DOJ involved in --

MR. KHOJASTEH: Agency lawyers were. Instruction stands. The fact that you think you can ask a witness about court filings in a live litigation and think it's not going to be subject to attorney-client communication --

MS. GREENBERGER: I don't need --

MR. KHOJASTEH: -- is nonsense to me.

MS. GREENBERGER: I really don't need the speaking objections.

MR. KHOJASTEH: Okay.

BY MS. GREENBERGER

Q Do you have a USAGM e-mail?

A Yes.

Q And do you have a State Department e-mail?

A Yes.

Q And what other e-mails do you use when conducting USAGM business, if any?

A I use my -- I really use my USAGM.
Q And are there any other e-mails you use?
A I had one called, I think, sr47@usagm, but I only used that, I think, once or twice, and I really don't use that.
Q Do you use text messaging when doing USAGM work?
A Not very often. Occasionally.
Q And do you use that on a personal phone or a work-provided phone or both?
A On my work phone.
Q And what other applications do you use to communicate about work-related things, such as Signal, WhatsApp, et cetera?
A I use my -- I use my good old-fashioned telephone, sometimes even a hard line.
Q And other than a telephone, do you use any of the services I just talked about or any other services like WhatsApp or Signal for work-related --
A I don't have WhatsApp. I do have

Signal. I use it occasionally. I don't use that for work.

Q We've talked a lot about -- today about the June 3rd statement to Congress, so maybe we can turn back to that. I have another question about it if --

A What was that one?

Q -- you have it handy. I don't -- I don't even, frankly, need you to look at it, but you can pull it up if you need it.

I want to talk about the six career people that have -- that were -- signed on the last page.

MR. KHOJASTEH: We're talking about Exhibit 3.

MS. GREENBERGER: Exhibit 3.

THE WITNESS: Thank you. Let me just get to that.

BY MS. GREENBERGER

Q Is Mr. Min still with the agency?

A My former GC? No.

Q And when did he leave the agency?

A I don't remember. I think he took a fork in the road, possibly, one of the generous offers for people who were contemplating leaving.

Q And do you know roughly when he took that fork in the road?

A I don't --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- recall.

BY MS. GREENBERGER

Q That's fine. And Mr. Morales, we already spoke about how he is on administrative leave, correct?

A I don't have this document. I know -- I know -- I know it, but I'd really like to have it in front of me.

Q Of course. I'm sure you have it, so we can find it.

A Is it there? No. I tried to put the -- all right. That's fine. This is the three -- this is the --

Q I'm just asking you about the names.

A -- stat min --

Q But it must be here somewhere.
A -- put together by senior career leadership?
MR. KHOJASTEH: You can use mine.
THE WITNESS: Okay. I've got it now. He's --
MR. KHOJASTEH: I gave her mine.
THE WITNESS: Okay. So Victor Morales?
BY MS. GREENBERGER
Q Yes. Victor Morales, we already established, is on paid administrative leave?
A He is a senior policy advisor on paid administrative leave currently.
Q And how about Mr. Napoli? What's his current status with the agency?
A He is still the chief financial officer and is actually going to go work in the private sector soon.
Q So he has announced that he's going to leave the agency?
A Yes.
Q As of when?

A I think it was like the 12th or the 13th, somewhere around there.

Q Of September?

A Yes.

Q And how about Ms. Thomas? What's her current status with the agency?

A She's on family leave.

Q And is she expected to return after family leave, to your knowledge?

A I don't know -- actually, I believe she took the fork in the road, DRP, the fork in the road where you have the option.

Q Right. So your understanding is Ms. Thomas has taken a fork in the road and was -- is going to leave the agency?

A I think that's what it was. It might have been VERA or VSIP. After the first RIF, between the first RIF and then when we reran the RIF, the union asked if we would consider to give people the option of having another -- another crack at taking the opportunity to have the fork in the road, which is a very generous opportunity

to be paid, and I think she took them up.

I think we had about 100 and -- I made the decision ultimately. I didn't have to, but I wanted to make sure that people were taken care of. And I think about 120, 130 people between the first RIF. Then we reran to the second one. You notice the number came down. It went from like 630 something to 500 and something because I made the generous offer to have people have another crack at VSIP, VERA and the DRP. And a lot of people took us up on that.

Q And when did you make that generous offer?

A After we reran the -- the first RIF.

Q Mr. Luer, what is his current status with the agency?

A He is currently working.

Q And has he announced any plans to leave the agency?

A No.

Q And how about Mr. -- I'm sorry. Is Terry Balazs -- how do you pronounce Terry's --

A I think it's Balazs.

Q And is Terry Balazs -- what's their current situation with the -- with the agency?

A He has served many decades, and I just spoke to him the other day, and I think he's planning to stay. He still enjoys his work.

Q We discussed earlier the 2026 budget justification and -- which proposes winding down the agency, correct?

MR. KHOJASTEH: Object to form. Lacks foundation.

BY MS. GREENBERGER

Q Does the 2026 budget justification seek appropriations to wind down USAGM?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: This is, I believe, put together by Roman Napoli, our CFO, and it does call for money if the agency were to be eliminated to wind it down.

MS. GREENBERGER: And --

THE WITNESS: Or to run the agency.

Same amount of money.
BY MS. GREENBERGER
Q I'm sorry. Can you explain that?
A The amount that it calls for could either be used to wind down the agency, if that's what the President and Congress decide, or to keep the agency running.
Q And if the agency is eliminated, what do you see USAGM's role in national security?
MR. KHOJASTEH: Object --
THE WITNESS: That's a --
MR. KHOJASTEH: -- to form. Lacks foundation. Calls for speculation.
THE WITNESS: It's a hypothetical.
MR. KHOJASTEH: Confusing.
THE WITNESS: Yeah.
BY MS. GREENBERGER
Q Do you believe USAGM has a role in national security?
MR. KHOJASTEH: If the agency's eliminated?

BY MS. GREENBERGER

Q Today, do you believe the US -- USAGM today has a role in national security?

A Yes, I do.

Q And if the agency is eliminated, what happens to that role?

A I think there's a way to continue to do international broadcasting. If the agency's eliminated, it doesn't mean that we don't do international broadcasting. It just means an agency that has not always been managed properly, been mismanaged, frankly, has had major corruption, doesn't exist, but broadcasting could continue. Voice of America could continue.

This agency has hurt Voice of America. The inept people who ran this agency have hurt Voice of America. The decisions made have hurt Voice of America and the people there. The corrupt people who ran it are one of the reasons we're in this situation right now. So I think there is a place for it, and, you know, there's a chance that we could see many different options

of where this agency could go.

And I know I talked about some of it during my congressional hearing, which I'm sure you're aware of. You know, the last time -- arguably, the last time VOA was effective is when it was under the Department of State, and so there's that option. The President has mentioned in his so-called skinny budget the elimination, but there's also, you know, the chance that it could continue.

MR. KHOJASTEH: I'm sorry. This just fell. It's your earring, Ms. Lake.

THE WITNESS: Oh, my earring. It's like -- excuse me, guys. I'll put my earring back in.

BY MS. GREENBERGER

Q I want to go back to a question because I'm concerned about the privilege invocation. I'm trying to see whether we can reach an agreement here.

To your knowledge, did USAGM search for any documents, including e-mails, in response to

the order to show cause?

MS. GREENBERGER: Are you directing her not to answer that question?

MR. KHOJASTEH: Can I raise -- can I make my objection?

MS. GREENBERGER: Yes.

MR. KHOJASTEH: I'm instructing you not to answer to the extent you have no independent knowledge other than what your lawyers told you as to what was done in connection with any document collection at the agency in response to this order.

So if, somehow, you know independently that there was a document collection done and the parameters of that document collection has nothing to do with what the agency lawyers told you or discussed with you, you're free to answer it. Otherwise, I'm instructing you not to answer.

THE WITNESS: And the only way I know about that is through my conversations with lawyers, so is there --

MR. KHOJASTEH: So move on.
BY MS. GREENBERGER
Q Are -- does --
MR. KHOJASTEH: Happy to take it to the Court. It's -- it's flagrant and it's like --
MS. GREENBERGER: I disagree.
MR. KHOJASTEH: So it's either you --
(Inaudible crosstalk.)
MS. GREENBERGER: There's no point --
MR. KHOJASTEH: -- haven't done commercial litigation or not --
MS. GREENBERGER: That is rude.
MR. KHOJASTEH: Document --
MS. GREENBERGER: That was rude, and it was unnecessary.
MR. KHOJASTEH: I'm just saying, you're drilling down on something, making it seem like my attorney-client privilege invocation --
MS. GREENBERGER: Can we --
MR. KHOJASTEH: -- is improper.
MS. GREENBERGER: I believe it is, but in any event, we don't have to clutter the

transcript. We can talk about it off the record.

MR. KHOJASTEH: Okay.

MS. GREENBERGER: I do believe it's improper.

MR. KHOJASTEH: God bless.

BY MS. GREENBERGER

Q So my -- my question for you was: Do either of the upcoming two deponents that we have, to your knowledge, were they involved in the search for documents in response to the order to show cause?

MR. KHOJASTEH: Same objection. Only if you know independent of discussions with your lawyers.

THE WITNESS: I don't know other than what my attorneys have told me on that.

BY MS. GREENBERGER

Q You've had no communications with -- directly with Ms. -- Ms. Soltani or Mr. Wuco on that?

A On?

Q The collection of documents.

A On them searching their e-mails?
Q Correct.
A I have not.
Q And you've had no communications with anyone else in the agency other than counsel about the searching for e-mails?
A That's right.
Q And did any custodian -- I'm sorry. Did any vendor or data technician say that they needed to search your documents, tell you that?
MR. KHOJASTEH: Object -- object to form. That's patently improper. Folks operating at the direction of counsel, you're asking for those communications?
MS. GREENBERGER: I completely disagree. I'm going to move on, but I completely disagree.
MR. KHOJASTEH: Good. Disagree.
MS. GREENBERGER: Can we please mark that?
THE WITNESS: You know, we -- I am -- my life --

MR. KHOJASTEH: You're asking -- I just want to be clear on this. You're asking -- your suggestion is if we -- if the U.S. -- U.S. agency hires a third-party vendor to collect documents and that third-party vendor communicates at the direction of counsel with a witness or a custodian --

MS. GREENBERGER: Why don't we have this --

MR. KHOJASTEH: -- you --

MS. GREENBERGER: No, why don't --

MR. KHOJASTEH: I'm just -- I want --

MS. GREENBERGER: -- we go off the record?

MR. KHOJASTEH: -- the record -- I want the record to be clear. Is that the position?

MS. GREENBERGER: I'd like to go off the record. I don't need to waste my time on this. Let's go off the record.

THE WITNESS: Can I try to answer this without --

MR. KHOJASTEH: We're okay not going

off the record.

MS. GREENBERGER: I'd like to go off the record.

MR. KHOJASTEH: We're okay not going off --

THE WITNESS: Let me try to answer --

MR. KHOJASTEH: -- the record.

THE WITNESS: -- that.

MS. GREENBERGER: Well, that's fine, but it's my --

MR. KHOJASTEH: So move on.

MS. GREENBERGER: -- deposition. No, it's --

MR. KHOJASTEH: It's not. Actually, both -- all parties -- D.C., all parties have to agree. I learned that. So keep going.

THE WITNESS: I'll try to --

MS. GREENBERGER: Go ahead --

THE WITNESS: -- answer.

MS. GREENBERGER: -- Ms. Lake. Sure. Thank you. I appreciate that.

THE WITNESS: My life is an open book.

MS. GREENBERGER: I appreciate that.

THE WITNESS: I write e-mails. I'm very professional. And we are an agency that has had FOIA requests. We get FOIA requests all the time, and so I don't go through my own e-mails. We have somebody on our staff who's a professional that does that when we have a FOIA request, so --

BY MS. GREENBERGER

Q And you personally have not searched through your e-mails, correct, for this case?

A For this case, I would leave that to what my attorneys would tell me I can answer on that. I'm assuming that --

MR. KHOJASTEH: You -- you can answer that as a yes or no, what you personally have done.

THE WITNESS: I personally haven't, but I'm trying to tell you, when it comes to requests, I don't have time to check e-mails. Somebody at the agency has a job to do that.

MS. GREENBERGER: Okay.

THE WITNESS: And they have access to my e-mails, and they can get in my e-mails and look through them.

BY MS. GREENBERGER

Q We were talking about your 8/13 declaration with the Court.

A A13?

Q Yeah. I think that's tab 1. I'm sorry. Exhibit 1.

A What's in A13?

Q August 13th.

A Oh, 8.

Q Now, I don't know that you're necessarily going to have to look at this, but there's no mention in this declaration of the August 29th RIF notices; is that fair to say? Or is it in here? Because I don't think it is.

A I see 17 says something about a RIF.

Q And 17 says your -- you have the right to consider --

A Right.

Q -- a RIF, correct?

A Uh-huh.

Q And it does not say that you plan to issue a RIF, correct?

A Yes. I think, at that moment, we didn't know when we were going to and if it was going to be complete and what we were going to do.

Q And when did USAGM decide it would rerun the RIFs?

A I think that was planned. You know, I think we planned that RIF. And when we sent out the notification to pull back the RIF, I think in that letter, from what I recall, it said something like -- I don't know if it said it would be rerun, but it basically didn't say the RIF isn't happening. I don't have the letter in front of me for when we recalled the first RIF.

Q You're speaking about the communications in late -- in late --

A The communication --

Q -- June when you rescinded the RIFs?

A Right.

Q Okay. And so are you saying that as soon as you rescinded the RIFs, you had always planned to rerun them?

A It was -- after we had -- after we would go through negotiations with the -- with the unions. Pardon me.

Q Right. And you talk about this, I think, in paragraph 18, the negotiations with the union and how you had to do that before the RIFs were issued?

A "Discretion to manage its workforce and personnel, including the right to consider statutorily authorized exercise of reduction-in-force." Yeah.

And then 18. In accordance with these obligations -- and we were -- I think -- I think in August, we were still negotiating with the unions.

Q And the CBA required a 60-day notice for a RIF?

MR. KHOJASTEH: Object to form. If you know. Lacks foundation.

THE WITNESS: That sounds about right.
BY MS. GREENBERGER
Q Okay. And so the RIFs that you -- well, let me go back.
So, on August 28th, the President issued an executive order concerning unions at --
A Yes.
Q -- USAGM? Okay.
And was it the same day or the next day that you terminated the CBA with the USAGM unions?
A I think it was --
MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "you."
THE WITNESS: I didn't put that letter. I believe it was Michelle Stewart in our HR -- our LER and our HR department, and I believe it was somewhere about there, within 24 hours or so.
BY MS. GREENBERGER
Q Okay. And so, within 24 hours, USA -- I'm sorry. Let me say that again.
Within 24 hours of the President's

August 28th EO, USAGM terminated the collective bargaining agreements with the unions, correct?

A Yes, thus effectuating the President's executive order.

Q And you were the acting CEO, correct, at the time?

A Yes.

Q And when Michelle Stewart terminated the CBA, did she do that at your direction?

A She told me she was going to be writing the letter and that it would be put out, and I glanced and took a look at the letter and directed her that it was okay to send it out.

Q Okay. And then the day after the CBAs were canceled, you sent the RIF notices, correct? You reran the RIF notices?

A Yeah, I think it was --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- right around there. I'd have to look at the calendar. Was it 28th or 29th?

BY MS. GREENBERGER

Q And at that point, August 29th, by then the CBAs were canceled, correct?

A Yeah.

Q And so you didn't have to RIF people with 60 days' notice. Now you could give them just 30 days' notice; is that --

A You could make --

Q -- correct?

A -- that argument.

Q And so, because the CBAs were canceled, it was easier to RIF people, correct?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "easier."

THE WITNESS: I think that the union knew that -- I mean, you'd have to have -- if you're not seeing that we're reducing the force in the government right now, you must be living under a rock. We have an executive order saying bring this to statutory minimum signed on the -- is it the 14th or issued on the 14th of March?

You have key leadership who signed and

put together the statutory minimum document leaving the agency, walking away from SES positions, and we'd already issued one RIF. And even though it was rescinded, that was issued, you know, many, many days prior. So I think most union members knew that there was a really good chance of a reduction in force.

BY MS. GREENBERGER

Q Let me ask the question again.

Because at the time of the August 29th RIF there was no CBA, you were able to have the RIFs go into effect quicker, only 30 days instead of 60, correct?

A Yeah. I'm not -- I don't know if that played into it or how it played into it. I don't -- I don't know if that was a calculation. That just happened to come down, and we worked with what we had.

Q What happened to come down? I'm sorry.

A The --

MR. KHOJASTEH: I'm going to object. To the extent that your knowledge of what the

requirements were under the CBA as it relates to the -- and the legal implications of an executive order and the like or the notice requirements, if that's all based on attorney-client communications with agency lawyers, I'm going to instruct you not to answer.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q Are you aware that the President issued a similar EO back in March about CBAs with other agencies?

A I recall that when that came out, yes.

Q And do you recall that after that EO, some agencies canceled their CBAs and some agencies kept their CBAs in place?

A I was not really following that. I was focused on our agency.

Q So you were not aware that any agencies kept the CBAs in place?

A I wasn't -- I wasn't following that.

Q And did you consider keeping the CBA in place after the President's August 28th EO?

A I intentionally tried to stay as far away from the RIF process as possible as to not have any appearance of impropriety, not -- not in building with them, not talking to the unions. This was done through OPM, our HR department and the unions.

Q But I'm not asking about the RIF. I'm asking about the decision to cancel the CBA after the EO was issued. So does that help?

A Michelle, who is -- Michelle Stewart, who is our union LER -- she works directly with the unions -- told me that she was going to write the letter. I may have had some conversations with our GC, which I won't go into, but I -- she put the letter together, and she's the expert in this, and we decided to move forward.

Q Did you ever have any discussions with people in other agencies about whether or not to cancel CBAs?

A That would have been something Michelle would have done.

Q Why did the agency cancel the CBA so --

well, strike that.

Why did the agency cancel the CBAs?

A You'll have to ask somebody else that. I don't know.

Q Well, you approved the decision, correct?

A I signed off on the letter, yes.

Q But you don't know why the decision was made?

A Well, we had an executive order by the President.

Q And were there any other reasons other than the executive order that you canceled the CBAs?

A No. Executive order.

Q And did canceling -- strike that.

When did you find out that USAGM would be added to the executive order stripping CBAs?

A I heard there was an executive order coming out later in the week that might deal with the unions. I think I heard like 24 hours in advance, and I figured we wouldn't be on it. We

weren't on the previous one. And then it came out and we were on it.

Q And how did you react to learning that you were on it?

A What do you mean, how did I react?

Q What was your -- were you happy? Were you upset? Were --

A Neutral, had no emotion.

Q Did you think it was good news for the agency or bad news?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: It doesn't matter what my opinion is on that.

BY MS. GREENBERGER

Q It does because I'm asking you, so please answer the question.

A I was neutral. I didn't have an opinion.

Q And why did you believe that the agency would not be on it?

A I just didn't know if it would. I had

heard there might be an executive order regarding the unions, and I -- I have a lot going on. I'm not waiting with baited breath to see what comes down. I'm working on things at the agency.

Q Other than Michelle, was there anyone else involved in the decision to cancel the CBAs?

A I don't know.

MS. GREENBERGER: Can you give me tab 12?

(Deposition Exhibit Number 21 was marked for identification.)

BY MS. GREENBERGER

Q I'm handing you a document that's been marked as Exhibit 21.

Is this a tweet that you issued on August 14th, 2025?

A Yes.

Q And it says, "I've got a judge who wishes he were running the agency."

So, first, is that referring to Judge Lamberth?

A Yes.

Q And in what way is Judge Lamberth trying to run the agency in your view?

MR. KHOJASTEH: I'm going to object to form. This is prejudicial and unnecessary. You want to do a line of questioning on this, all good, but --

MS. GREENBERGER: This is a completely inappropriate speaking objection and prejudicial. It's appropriate and it's not prejudicial --

MR. KHOJASTEH: Do your thing.

MS. GREENBERGER: Go ahead.

MR. KHOJASTEH: Do your thing. It's just a room full of people --

THE WITNESS: What was the question?

MR. KHOJASTEH: -- and you're wasting their time.

THE WITNESS: What was the question again?

BY MS. GREENBERGER

Q In what way do you believe Judge Lamberth is trying to run the agency?

A I think there's a lack of respect for

Article II and the President's powers.

Q And you write, "and literally threatening to put me in contempt of court if I don't produce more propaganda."

What propaganda are you referring to there?

A Government-funded news is also called propaganda if you look up the definition. So what we put out is propaganda. Would you disagree with that? Government's funding this agency -- actually, the American taxpayer is funding it. The U.S. government is funding this agency, and they say they're independent, but it's being funded by the U.S. government, and when the government funds media, that's called propaganda.

Q So, in your view, is everything that VOA publishes propaganda?

A If you look up the term "propaganda," yes.

Q And --

A We're government funded.

Q And does that include --
A And this is media. Do you disagree with that?
Q And does that include under your watch with your role in the agency; it's still propaganda?
A It -- the definition of propaganda is government-funded media. I mean, it really is.
Q Have you done anything while with the agency to ensure that it's truthful or accurate?
A I have no say in the editorial. There's something called an editorial firewall, which I'm sure you're aware of. I hope you're aware of it. Is that in the IBA? No, that's something different. NDAA.
Q And you said that you thought Judge Lamberth didn't have respect for Article II of the Constitution?
A I think there's been a -- yes.
Q And do you believe that it's improper for him to be reviewing USAGM's actions?
A I think it's improper for district

court judges to try to take control of the executive branch.

Q Did you --

A And I'm not alone in that.

Q Did you see that in his order, he said that personnel decisions are within the agency's purview, but that discretion is neither boundless nor shielded from judicial review and remediation?

A I'm sure I read that at some point, yeah.

Q Do you agree that district courts can review and remediate agency personnel decisions?

A I can agree with --

MR. KHOJASTEH: Object to form. This is irrelevant.

MS. GREENBERGER: I disagree. I'm going to -- please continue.

MR. KHOJASTEH: I'd love for you to articulate how this --

MS. GREENBERGER: I'm happy to off the record when we're done --

MR. KHOJASTEH: I'm just saying, I'd love to hear you --

(Inaudible crosstalk.)

THE WITNESS: Can you ask the --

MR. KHOJASTEH: -- articulate it.

THE WITNESS: -- ask the question --

MR. KHOJASTEH: It seems like to me it's like a big waste of time. But, listen, you'll get your gotcha moment so you can go back to -- go back to --

MS. GREENBERGER: Excuse me.

MR. KHOJASTEH: --- (redacted) and tell people you took her -- put her on the record for seven hours. Do it. This is fine. It's entirely disrespectful. This is a head of an agency. To go a day away from this --

MS. GREENBERGER: Excuse me. This is so deeply inappropriate. I'm going to continue my questions.

MR. KHOJASTEH: Go for it. Go for it. And it's going to be -- and I'll have the same view of it. You were --

MS. GREENBERGER: Can I --
MR. KHOJASTEH: Five hours through --
MS. GREENBERGER: Can you please stop?
MR. KHOJASTEH: Five hours through today, you were --
MS. GREENBERGER: Can you --
MR. KHOJASTEH: -- professional.
MS. GREENBERGER: I am --
MR. KHOJASTEH: This is nonsense.
MS. GREENBERGER: This is her tweet that I am asking her about, and I am asking it respectfully, and I'm going to continue to ask it.
MR. KHOJASTEH: Go for it.
MS. GREENBERGER: And I am not making this personal, and you are the one who is making this personal.
MR. KHOJASTEH: I'm just saying, this is -- it's -- this is --
MS. GREENBERGER: Can you please stop and let me continue my questioning?
MR. KHOJASTEH: Go for it.

MS. GREENBERGER: Can you please read back the last question?

(Whereupon, the reporter read the record as requested.)

THE WITNESS: The district -- I'm not a lawyer.

BY MS. GREENBERGER

Q Well, you had earlier said that you had a view that this judge was not respecting the Constitution, so I'm trying to understand whether you think district courts can review agency personnel --

A Apparently --

Q -- decisions.

A -- they can, because we're sitting in a district court right now.

Q What did you mean by you've got some experience in lawfare? What does lawfare mean?

A It means malicious lawsuits that are filed by overly litigious people or by attorneys who stand to make millions of dollars or who have already made millions of dollars from an agency

by stringing people along, stringing their hopes along, and suing them nonstop to make a fortune off the federal government, i.e., the American taxpayer, the hardworking men and women across this country, funding a lot of these -- of these lawfare lawsuits that have for many years come through this agency. I've been the victim of it myself.

Q You view --

A A lot of people have.

Q You view these lawsuits as lawfare as you just described it?

A I think it could be fit into that category.

MS. GREENBERGER: Can you give me tab 41, please? I'm going to ask you about another tweet. Oh, so sorry. I'm sorry. I have to have that be marked --

(Deposition Exhibit Number 22 was marked for identification.)

MR. KHOJASTEH: Thanks.

MS. GREENBERGER: -- first.

BY MS. GREENBERGER

Q I'm handing you an Exhibit 22.

A I love that you're following my tweets.

Q Is this a tweet that you issued on August 7th, 2025?

A Can you read that for me?

Q Sure. I'm really just asking about the last three sentences where you say, "A D.C. District Court judge is threatening to place me in contempt of court and throw me in jail for not running enough VOA propaganda."

Do you see that?

A Yeah.

Q "It's absurd. I'm just hoping that the U.S. Marshals don't act on it."

A Well, but, again, taking a part of it. "And let me tell you, Mike, the illegal aliens destroyed the border. There was so much trash and destruction on the border. They don't give a shit on the environment. By the way, I noticed your post about how the activist judge's show cause order with Jeff, I have the same thing

happening to me. A D.C. district court judge is threatening to place me in contempt of court and throw me in jail for not running enough VOA propaganda. It's absurd. I'm just hoping that the U.S. Marshals don't act on it."

Q And this was also referring to Judge Lamberth, the D.C. District Court judge?

A I don't think we have another judge that I'm aware of.

Q And when did Judge Lamberth threaten to throw you in jail?

A Well, that's what I was told, that he's threatening contempt.

Q Who told you that Judge Lamberth was --

MR. KHOJASTEH: Object to --

BY MS. GREENBERGER

Q -- threatening to --

MR. KHOJASTEH: Object to form. I'm going to instruct her not to answer to the extent that --

BY MS. GREENBERGER

Q Did anyone other than counsel tell you

that Judge Lamberth was threatening to throw you in jail?

A I am going to take the advice of my counsel and not answer that.

MS. GREENBERGER: Well, I don't think your counsel is saying that he can't answer that question.

MR. KHOJASTEH: You can answer yes or no whether someone other than counsel told you that Judge Lamberth was trying to throw you in --

MS. GREENBERGER: In jail.

THE WITNESS: It was counsel. Not throw me in jail. Put me -- hold me in contempt of court.

BY MS. GREENBERGER

Q So my question was: Did anybody tell you that Judge Lamberth was threatening to throw you in jail?

MR. KHOJASTEH: I'm going to object to form. To the extent that a lawyer told you that --

MS. GREENBERGER: Other than a lawyer.

MR. KHOJASTEH: So that's asked and answered.

MS. GREENBERGER: No. She didn't answer it. She -- she said --

THE WITNESS: I answered -- I misheard and I answered the wrong question. My counsel told me that the judge --

MR. KHOJASTEH: You don't need to say what your --

THE WITNESS: Okay.

MR. KHOJASTEH: -- counsel told you. If your counsel's the one who conveyed it, I'm instructing you not to answer the question.

THE WITNESS: Okay.

BY MS. GREENBERGER

Q Did anyone other than a lawyer tell you that Judge Lamberth threatened to throw you in jail?

A Not the throw me in jail, but the contempt of court, which you could then extrapolate to mean throw in jail.

Q Judge Lamberth never said that he was going to throw you in jail, correct?

A Well, what is contempt of court? What's the punishment for contempt of court? Oftentimes, it's being thrown in jail. Is that right? Has any --

Q Often -- oftentimes --

A Has anybody ever been held in contempt of court and been put behind bars, to your knowledge?

MR. KHOJASTEH: Ms. Lake, it's her deposition.

THE WITNESS: Okay.

MR. KHOJASTEH: Let her ask the questions, please.

BY MS. GREENBERGER

Q I can show you it if you want, but we can go quicker. You described Judge Lamberth last week as a radical district judge; is that correct?

A I have a right to my opinion.

Q You absolutely do. I'm just trying to

ask what your opinion is.

Is that how you described Judge Lamberth?

A That's my opinion.

MR. KHOJASTEH: You're asking her whether that's her opinion or whether that's how she described him?

MS. GREENBERGER: I'm asking her if that's how she described him in a tweet, which I'm happy to show her. I'm just trying to move things along.

THE WITNESS: What was the date on that tweet?

BY MS. GREENBERGER

Q August 28th.

A Can I read the tweet?

Q Absolutely.

A I'm sorry to make you --

Q No, it's --

A -- do that, but --

Q -- fine.

MS. GREENBERGER: 42.

(Deposition Exhibit Number 23 was marked for identification.)

THE WITNESS: Oh, I'm sorry. I'll figure it out. By the time -- by the time we do seven hours, I'll figure it out.

Update. Oh, those guys are -- "We fully intend to appeal this absurd ruling. Elections have consequences, and President Trump run the executive branch. I have confidence that the Constitution will eventually be in force, even if not by Judge Lamberth and other radical district judges."

Yes, that's my statement.

BY MS. GREENBERGER

Q And in that statement, were you --

A It wasn't a tweet. It was a statement. But he put that in.

Q I appreciate that clarification.

In that statement, were you characterizing Judge Lamberth as a radical district judge?

A Judge Lamberth, I believe, is a

district judge. Is that correct?

Q He is.

A And I think some of his rulings have been very radical.

Q And to summarize, you think -- you've made public statements saying Judge Lamberth is trying to run USAGM, correct?

A Do I have to love this guy? Is it required that I love the judge?

Q Can you answer my question, Ms. Lake?

MR. KHOJASTEH: Well, let's not -- let's not recover ground you've already covered. You've --

MS. GREENBERGER: Well, I --

MR. KHOJASTEH: You've -- you've got testimony on each of those points already.

MS. GREENBERGER: I can summarize the testimony so it's clear in one place. That's a standard technique.

MR. KHOJASTEH: Okay.

BY MS. GREENBERGER

Q So, to summarize, you've made public

statements saying Judge Lamberth is trying to run USAGM, correct?

A I've exercised --

MR. KHOJASTEH: Object to form. Mischaracterizes the testimony.

THE WITNESS: I've exercised my First Amendment right.

MS. GREENBERGER: Ms. Lake --

THE WITNESS: By saying that, that's my First Amendment right.

BY MS. GREENBERGER

Q I'm just trying to summarize what you've said, not challenging what you've said, not having a constitutional conversation about your right to say it.

Have you or have you not said that Judge Lamberth is trying to run USAGM? You have, correct?

MR. KHOJASTEH: Object to form. Mischaracterizes testimony. There's a whole tweet. There's more than that one sentence. Like, if you're going to -- read the whole thing

she said.

THE WITNESS: Do you have the tweet? I mean, I probably said that, yeah. That's my opinion, and I am the world's foremost expert in my own opinion.

BY MS. GREENBERGER

Q And your opinion is that Judge Lamberth is a radical judge who produces illegitimate rulings, correct?

A I think --

MR. KHOJASTEH: Object to form. This is irrelevant --

MS. GREENBERGER: I --

MR. KHOJASTEH: -- prejudicial. I mean --

MS. GREENBERGER: I'm really almost done --

MR. KHOJASTEH: I have --

MS. GREENBERGER: -- with this line, if you would let me finish it.

THE WITNESS: What was the last part? I didn't say -- what did I say, rational, or --

MS. GREENBERGER: I thought you said --
MR. KHOJASTEH: You're mischaracterizing something. She didn't say --
MS. GREENBERGER: These are your words.
MR. KHOJASTEH: -- illegitimate opinions. Like, this was like -- you're just, like, editorializing her tweets.
THE WITNESS: I didn't say illegitimate.
MS. GREENBERGER: Would you please stop with the speaking objections?
MR. KHOJASTEH: I will, but this is --
MS. GREENBERGER: Then just stop.
MR. KHOJASTEH: At this point, we're off the rails. We're going through her tweets. This has no relevance to the case or the order.
MS. GREENBERGER: I completely disagree.
BY MS. GREENBERGER
Q Did you have these views about Judge Lamberth when you were responding to his orders in July seeking information about your plans to

run the agency?

MR. KHOJASTEH: Object to form.

THE WITNESS: I don't know what my views were back in July of this judge. I know that he's made some rulings that I haven't thought were good, and I think the judicial branch has really overstepped its bounds.

BY MS. GREENBERGER

Q And did your views about Judge Lamberth impact your response to his orders?

A Absolutely not. No way.

Q You would never do that?

A No. I'm answering to the best of my ability questions that have been asked over and over and over.

Q And your personal views --

A He's trying to force me to give new answers. I mean, my answers are my answers.

Q And your personal views about the district judge --

A I --

Q -- had no impact, correct?

MR. KHOJASTEH: Object to form. Asked and answered.

THE WITNESS: I don't hate this judge. I really don't. I don't. I don't dislike any one of you. I don't hold -- harbor hate in my heart. I'm doing what the judge is asking. He doesn't like it. He doesn't like it. Four times, he's asking the same questions. He wants me to create new answers. I'm not going to create an answer to make the judge happy. I've got to be honest. I'm trying to run an agency.

I walked away from my life to move here away from my children to work for the United States Government and the Administration of President Donald J. Trump because I believe that man wants to save our country. And what is going on is a disgrace in this country with these judges, these judges who are trying to take a huge mandate that President Trump has and take away and try to keep him from getting work done.

I don't dislike him. I don't personally know him. I think some of his rulings

have been absurd, as I said, terrible. He went crazy on the J6ers. He wants transgender men who are violent, cross-dressing men who are mentally ill to be in a jail cell with women. I actually know the difference between men and women, and I actually give a shit about women and their safety.

So I don't love his rulings, but I don't have any disdain in my heart for this man. I don't know him. And we're answering to the best of our ability. And he keeps asking and asking and asking the same questions. I don't know what more I can give him.

I've sat here today away from the agency that I've been charged with helping to run, answering all of your questions, and you keep asking the same questions over. I don't -- what do you want me to say? What would make you happy? I'm giving you the truth, and I don't know what else I can do.

BY MS. GREENBERGER

Q In official press releases, you've

repeatedly explained that you're trying to eliminate waste, fraud and abuse at USAGM?

A Yes, I am.

Q Okay.

A I'm trying to stand up for the American taxpayer.

Q And the Court said that when Congress appropriated $260 million to VOA for fiscal year 2025, it did not anticipate such a significant sum of taxpayer funds would be used to pay employees to sit at home for months on end making no contribution to VOA's statutory mandate.

Do you agree with that?

A Well, a lot of --

MR. KHOJASTEH: Object to form. Calls for speculation.

THE WITNESS: A lot of federal employees have been sitting home for a long time. Thanks to President Trump, he's getting butts back in office chairs.

BY MS. GREENBERGER

Q But it's true that since March 15th,

nearly all of VOA's hundreds of millions of dollars have been used to pay VOA journalists and other employees to not work, right?

A They're on paid administrative leave. We're following the laws and the -- we are doing -- we did a reduction in force. You can't just fire people. I hope you understand that. There is a process underway to reduce the size and scope of the government, and you can't just fire people. You may want people just to be fired willy-nilly, but I follow the law, and the law requires that you go through a process.

And when we went to statutory minimum, we didn't need thousands of people. We needed fewer people. And it sounds like maybe you guys would rather we just throw people to the curb and fire them right away so that we're saving the government money, but we have to go through a process. These are lives that we're talking about.

Q Do you think it's wasteful to spend hundreds of millions of dollars to pay employees

to stay at home?

A I think it's wasteful to continue employing thousands of people when they're not needed. That would be -- over the long term, that would be very wasteful. So we're working to cut the waste, and there's a process involved. When you're trying to cuts the waste, believe me, of the bureaucracy of the federal government, when you're trying to cut the waste, there's a process.

I wish it were faster. I wish it were easier. I wish it were less painful. But there's a process we must go through, and we're going through that process, taking all the legal steps to do so, and treating people in the best way we possibly can.

Q I want to turn to a different topic, Ms. Lake.

On May 6th, you announced an agreement to uses OAN's newsfeed on Voice of America and other USAGM services?

A I don't know about the date. That

sounds right, if you're -- if you feel comfortable with that date.

Q I can show you your tweet.

A Okay.

(Reporter clarification.)

MS. GREENBERGER: Yes. Thank you.

(Deposition Exhibit Number 24 was marked for identification.)

THE WITNESS: That was not my fault.

MS. GREENBERGER: No, it was my fault.

MR. KHOJASTEH: This is 24?

MR. BLUMIN: Yeah.

THE WITNESS: Okay. Let me read this. "This idea came about after OCB suggested we explore OAN as a newsfeed option." I'm a damn good writer.

BY MS. GREENBERGER

Q So does this refresh your recollection that on May 6th, you announced an agreement to use OAN's newsfeed?

A Yes.

Q And -- and the terms of this

partnership are memorialized in a memorandum of understanding? I can show it to you. I will show it to you.

A Yeah, let me see. Let me take a look at it.

(Deposition Exhibit Number 25 was marked for identification.)

MR. KHOJASTEH: Thank you.

BY MS. GREENBERGER

Q And I'm handing you what's been marked as Exhibit 25, which is a memorandum of understanding from the U.S. -- United States Agency for Global Media and Herring Networks.

A Thank you.

Q And turning to the last page, you signed this MOU on behalf of USAGM; is that correct?

A Yes, I did.

Q As senior advisor?

A To the CEO, yes, with delegated authorities given to me by the CEO.

Q And do you know whether this document

was ever provided to the Court?

A I don't know.

Q Okay. And was it --

A My attorneys would know that.

Q Was it your decision to enter into this partnership with OAN?

A This came out after a suggestion from our acting director at Office of Cuba Broadcasting. He asked if it would be possible if we could -- if he -- if he and his team could get access to OAN, and I said, I don't know, let me find out.

Q And so then you reached out to OAN?

A I -- I called OAN and just said, would you consider -- is that something that you would consider, offering your content for free? Before I explore this any further, I didn't want to bark up the tree of bringing in leadership and saying, how do we handle this? I had a very brief conversation, and he said, yes, we would consider that.

Q And what did you do next as to the OAN

agreement?

A Then reached out to my GC, which I won't -- I guess I -- I reached out to my GC and senior leadership, including Victor. I reached out, obviously, to Victor, the CEO, and his right-hand person, and I said --

MR. KHOJASTEH: Keep it -- to the extent you're discussing communications you had with counsel and Mr. Morales regarding this agreement --

THE WITNESS: Okay.

MR. KHOJASTEH: -- I'm going to allow you to answer the question, but keep it very high level.

THE WITNESS: Okay.

MR. KHOJASTEH: She's asking what happened next. Is that fair?

MS. GREENBERGER: Uh-huh.

MR. KHOJASTEH: She's not asking what you said to anyone.

THE WITNESS: Okay.

MR. KHOJASTEH: She's saying, what

happened next?

THE WITNESS: I wanted to -- I always tried to have the leadership at the agency who have been there many, many years help me make decisions. They've been there -- as I said, Victor's been there 36 years. And this is -- as a leader, I like to ask the team what they need. I can't tell OCB what to produce in the news. I can't tell VOA what to produce. There's a firewall.

But if they come to me and say, we need something, could you consider providing this, I like to consider it. And -- and OCB asked about it. I asked our team, would this be a good thing, bad thing, how do you feel about it? And they responded with -- I won't tell you what the attorney said, but I got response from key leadership that this sounds like a good idea, and not only that, but they said they've done this before with other media companies, where they've entered into a memorandum of understanding, an MOU, to share content freely. And so then I put

it in their court and said, okay, let's see if we can make that happen for OCB, which is requesting it.

BY MS. GREENBERGER

Q And other than Mr. Morales and your counsel, who were the senior leadership you discussed this with?

A I don't remember. It was an e-mail with counsel -- there may have been more people that I asked, but I don't know if all of them responded.

Q And you said this was a communication that occurred over e-mail?

A I believe this was an e-mail, yeah.

Q And you said that there were similar -- did I understand you correctly that you said that there were similar MOUs entered into with other media companies?

A Before my time.

Q And what were those other media companies?

A I don't remember. One of the --

Victor's right-hand person said, oh, yeah, we've done this before, and as a matter of fact -- and she sent the attachment. This is what it looks like, that we should do this, and this is great. They loved it.

Q Who's Victor's right-hand person that you're referring to?

A Joan Mower.

Q And I think you already said that under this deal -- let me pull it up, but I gave it to you -- USAGM would pay nothing, correct?

A It's free.

Q And you would -- the agency would license programming from OAN?

A I don't know if license is the right word. They would share their programming with us if the newsrooms chose to use it. They're under zero obligation to use. And none of it has been used at VOA. VOA has not used any of it.

Q And do you understand why that is?

A They made the choice not to.

Q Who made the choice?

A I'm assuming the folks in the newsroom.
Q And we talked earlier about --
A And the reason they haven't is because in the process, apparently, of -- of the deal, they might want to use a 30-second clip of what ran on OAN. Maybe it was a summit or something. And it was determined through the attorneys who were working out the deal that you couldn't just use a 30-minute snippet. You'd have to use the entire newscast, and that's not -- that wasn't conducive for VOA to do that.
Q We talked earlier about the requirement that VOA not duplicate domestic broadcasting. Do you recall that?
A Yes.
Q And did you consider whether this deal where OAN would provide content -- provide its own content would duplicate its domestic broadcasting?
MR. KHOJASTEH: Object to form. Lacks foundation. Mischaracterizes her prior testimony and what she was talking about when you guys

talked about duplication.

THE WITNESS: VOA is not broadcast domestically. VOA is broadcast internationally.

BY MS. GREENBERGER

Q Is OAN broadcast domestically?

A Yes.

Q And so if OAN is providing its domestic content for VOA to broadcast internationally, do you think that's a problem with the duplication -- the non-duplication requirement?

A Well, you have to talk to the attorneys who pulled this up. I was asked by Office of Cuba Broadcasting if I would work a deal -- if I would check into this. I asked senior leadership. They liked the idea, and I handed it off to our attorneys to do the deal.

Q The second bullet says that OAN would "Provide access to OAN's broadcast and select content library for potential use Worldwide, excluding the United States and its territories."

Did you understand whether the content provided by OAN would include television

broadcasts?

A It says "potential use," and I just let the -- the GC put that together.

Q No, but I'm --

A So it's --

Q -- not asking a legal question. I'm asking about the type of content that OAN would be providing. Would they be providing television broadcasts?

A I was hoping that it would be video clips that could be used just if we needed video of something, sound bites, but it turned out we have to run the entire show, and that wasn't going to be conducive for the folks in the newsroom. And I don't make the decisions, but they decided not to do it.

Q And did you understand that the OAN content would include any radio broadcasts?

A I'm unaware of that.

Q And did you have an understanding -- am I right that the OAN content would only be in English, or would it be in other languages?

A Well, I would say we would have to translate it, and therein lies the problem. There was not an ability to translate it because of the -- as -- I believe as some of the journalists considered using it, it came to their awareness that they had to run it in its entirety, and they could not translate it. That fell outside the agreement, so they never used it. So a lot of people upset about this, but they never used it. It never aired.

Q Would you agree that OAN has a pro-Trump perspective?

MR. KHOJASTEH: Object to form. Lacks foundation. Vague as to "pro-Trump."

BY MS. GREENBERGER

Q Let me -- OAN has described itself in its own communications as one of the greatest supporters of Donald Trump.

Have you heard that?

MR. KHOJASTEH: Object to form. Lacks foundation.

THE WITNESS: I think that they love

this country, and President Trump loves this country.

BY MS. GREENBERGER

Q Do you understand whether OAN has a conservative or liberal perspective?

A I think they have --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- common sense.

MR. KHOJASTEH: Lacks foundation. Vague as to "conservative."

BY MS. GREENBERGER

Q So you don't have a view that they have a politically conservative perspective?

A They have a common sense, pro-America perspective.

Q And you think they're -- you wouldn't agree that they're pro-Trump?

A I think they're pro-America, and because President Trump is pro-Trump [sic], they kind of equal each other.

MS. GREENBERGER: Why don't we take a break now?

THE WITNESS: How long -- much longer are we going to go? I actually do have --

MR. KHOJASTEH: She has another hour on the record, so that's how long --

THE WITNESS: Okay. Can we make the -- can we make this a short break?

MR. KHOJASTEH: Sure.

VIDEO TECHNICIAN: This marks the end of Media Unit No. 6. Going off the record, the time is 18:01 p.m.

(Recess 6:01 p.m. to 6:17 p.m.)

VIDEO TECHNICIAN: This marks the beginning of Media Unit No. 7. Going back on the record, the time is 18:17 p.m.

BY MS. GREENBERGER

Q Ms. Lake, have you ever appeared on OAN?

A In the past, yes, I have.

Q Roughly how many times?

A I have no idea.

Q And was that before becoming senior advisor, since you joined USAGM, or both?

A Both.
Q And did you have a view on OAN's coverage of you when you appeared?
A I thought the questioning was fair.
Q And I think, in this deposition, you've characterized some news sources as fake news; is that true?
A Fake news, yeah, biased, yeah.
Q And do you believe that OAN is fake news?
A No.
Q And do you believe that OAN is biased?
A I think -- I think everyone shows a little bit of bias. It's human nature. The question is, can you be fair? Can you be a public service to the -- to the people and put out information? They're not trying to twist the story.
Q And do you believe that OAN has been fair?
A Generally, I do.
Q Okay. In your declaration, which is

Exhibit 1, the August 13th declaration, you state that USAGM is in ongoing discussions with Newsmax in pursuit of a similar agreement.

A I don't know anything about those discussions because I've asked to not be a part of those intentionally.

Q And --

A So if they're ongoing, it's only because somebody told me that.

Q What was the basis for you writing in your declaration that there were ongoing discussions with Newsmax?

A I believe it was Frank or somebody told me that we were in ongoing.

Q And do you know when those discussions began?

A No.

Q And have you been involved in any conversations with anyone at Newsmax concerning a similar agreement?

A No.

Q What's the status of this potential

partnership with Newsmax?

A I don't know. I found out that there -- I found out that Victor or Joan or somebody was talking to them, that they had inquired, and I said, I don't want to be a part of any conversation because I do appear on their network, and I appear on a lot of networks, and it's better that I just stay completely out.

And if the legal department wants to work on an agreement with Newsmax or any other outlet, CNN, whatever outlet they want, they can do that, and then, at the very end, when they're close to when they have a deal, I will glance at the -- at the document and then either approve it or, you know, ask for changes if I see something that was glaringly wrong.

Q And paragraph 16 of your August 13th declaration states that USAGM is taking steps to supplement content by contracting with domestic news networks to obtain lawful permission to use, translate, disseminate --

A Pardon me. Where are we?

Q Paragraph 16.

A 16. "To obtain lawful permission." "The goal is to share content."

Q And does USAGM have a goal, if you know, for what portion or percentage of the content you'd like to come from domestic news networks?

A I like originally produced content, but if our -- if our team is asking us for this, I think it's important to reflect that they want access to some of this. And if they want access to some of it, as they did with OAN, this was not my idea. I had no -- none of it was my idea. It all came from Office of Cuba Broadcasting.

And then if other outlets are saying, oh, you have a deal with them, we'd like to offer you free content, I think it's worth it for the American taxpayer to provide free content. If people want to use it, they do. I don't tell them what to put on the air.

Q I'm going to turn to another topic that you testified to. I just want to make sure I

understand your testimony.

When I was asking you questions about President Trump's August 28th EO about the unions, I believe you said that you were not expecting USAGM to be on the list of agencies covered by that EO.

A I was unsure if they would be on it. I heard there was going to be an EO, but you never know until they come out. It's been in the past where people said, there's going to be an EO, potentially, and then it never comes out.

Q Am I right that you never contacted anyone at The White House to ask to be added to the EO?

A I don't --

MR. KHOJASTEH: Object to form.

THE WITNESS: -- recall if I did. I don't recall doing that.

BY MS. GREENBERGER

Q And to the best of your understanding, did anyone at USAGM contact anyone at The White --

A Actually -- actually, I think that somebody -- I don't know if it was from The White House -- right before -- I'm sorry. I'm just having -- I'm -- the memory's coming back to me. I think it was like the day before we -- somebody reached out to us from -- I don't know if it was OPM or what it was. Maybe it was The White House -- and said, who is the -- what's the e-mail for the person in charge of the agency? They were given my e-mail, and they sent a draft of that. So I did know with a little bit of knowledge in advance.

Q But to clarify my question, I was asking whether you or anyone at the agency, to your knowledge, reached out to The White House to ask to be added to the EO before you received that draft.

A I don't recall doing that, no.

Q And to your knowledge, you have no information --

A To my recollection at this moment, I don't recall. I mean, I don't recall. Are you

talking about the EO of -- dated what?

Q August 28th.

A The EO dated August 28th, not that I recall.

Q And you don't recall you reaching out or anyone at the agency, to your knowledge, reaching out, correct?

A At this moment -- at this moment, I don't recall.

MS. GREENBERGER: Okay. Hold on one second. I have nothing further for you, Ms. Lake, right now.

THE WITNESS: We're just getting warmed up.

MS. GREENBERGER: It may be -- we're expecting some documents. It may be that we have to call you back, and we'll deal with your counsel if we do that. I don't know if your counsel has any questions, in which case, I reserve the right to follow up.

MR. KHOJASTEH: One second.

MS. GREENBERGER: Sure. I hope this

can get you home earlier than you hoped.

THE WITNESS: Pardon me? Are you talking to me?

MS. GREENBERGER: It's okay.

MR. KHOJASTEH: We're -- we don't need to ask any questions.

MS. GREENBERGER: Okay. The deposition is concluded.

THE WITNESS: Thank you.

MS. GREENBERGER: Thank you.

VIDEO TECHNICIAN: Thank you. We are off the record. One moment. We are off the record at 18:24 p.m. This concludes today's testimony given by Kari Lake. The total number of media units used is seven and will be retained by Veritext.

(Whereupon, at 6:24 p.m., the deposition of KARI LAKE was concluded.)

* * * * *

CERTIFICATE OF NOTARY PUBLIC

I, ERICK M. THACKER, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

ERICK M. THACKER
Notary Public in and for the
District of Columbia

My commission expires:
June 30, 2029

ACKNOWLEDGMENT OF DEPONENT

I, KARI LAKE, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes or corrections, if any, appear in the attached errata sheet signed by me.

---------- ----------

Date KARI LAKE

7576480

Sarmad M. Khojasteh, Esquire
sarmad.khojasteh@usdoj.gov

September 15, 2025

RE: Patsy Widakuswara, et al. vs. Kari Lake, et al.
9/9/2025, Kari Lake (7576480)

The above-referenced transcript is available for review.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.

The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at erratas-cs@veritext.com.

Return completed errata within 30 days of receipt of testimony.

If the witness fails to do so within the time allotted, the transcript may be used as if signed.

Yours,
Veritext Legal Solutions

Patsy Widakuswara, et al. vs. Kari Lake, et al.

Kari Lake (#7576480)

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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