

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

RADIO FREE ASIA,

Plaintiff,

v.

UNITED STATES, *et al.*,

Defendants.

No. 25-cv-00907-RCL

MIDDLE EAST BROADCASTING  
NETWORKS, INC.,

Plaintiff,

v.

UNITED STATES, *et al.*,

Defendants.

No. 25-cv-00966-RCL

**DEFENDANTS' STATUS REPORT**

The Defendants respectfully submit this status report pursuant to the Court's April 25, 2025, Order requiring Defendants "to restore the FY 2025 grants with USA GM Networks Radio Free Asia and Middle East Broadcasting Networks, Inc. such that international USAGM outlets can 'provide news which is consistently reliable and authoritative, accurate, objective, and comprehensive,' 22 U.S.C. § 6202(a)," Order, ECF No. 25 at 2. The April 25, 2025, Order requires Defendants to report on their compliance with the Court's Order on the first day of each month. *See id.*

With respect to Radio Free Asia (RFA), USAGM has completed all internal processes

necessary to send a payment disbursement request to the Department of the Treasury. *See* Decl. of Roman Napoli, *Widakuswara v. Lake*, 25-cv-1015, ECF No. 102, ¶¶ 5–7 (describing processes that must be completed at USAGM and Treasury for disbursement to occur). That request has been submitted to the Department of Treasury for final review. The attached screenshots reflect USAGM’s successful transmission of a request for payment to RFA to the Department of the Treasury’s inbound folder for payments. Upon Treasury approval, USAGM will submit the payment into the Department of Treasury’s Secure Payment System for final disbursement. Absent a stay of this Court’s order by the U.S. Court of Appeals for the D.C. Circuit, Defendants anticipate that the funds will be disbursed by the Treasury to RFA on May 2, 2025.

With respect to the disbursement to Middle East Broadcasting Networks, Inc. (MBN), USAGM attempted to complete the same process but encountered a technical issue that caused the request for payment to be rejected by Treasury. Specifically, as shown in the attached screenshot, MBN’s System for Award Management (SAMS) Identification number expires today, and such a number is a technical requirement necessary for Treasury to accept a payment request. USAGM OCFO staff notified MBN via email of this issue yesterday morning, spoke with MBN’s leadership yesterday, and has also followed up by email today regarding the need to update MBN’s SAMS Identification number. Undersigned counsel also notified MBN’s counsel of this issue today. USAGM stands ready to resubmit the payment request to Treasury once MBN’s SAMS number is renewed. Absent a stay of this Court’s order by the U.S. Court of Appeals for the D.C. Circuit, USAGM will resubmit the payment request as quickly as practicable once this technical issue is addressed.

Dated: May 1, 2025

Respectfully submitted,

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RMR*IV*RFABN-24-006*PI*400000.00\ 0040000000 0RADIO FREE ASIA	

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Activation Date	<input type="text" value="05/07/2024"/>
Last Updated Date	<input type="text" value="05/07/2024"/>
Registration Expiration Date	<input type="text" value="05/01/2025"/>
Purpose of Registration	<input type="text" value="All Awards"/> ▾

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Procurement Publish Time-Stamp	<input type="text"/>
Travel Publish Time-Stamp	<input type="text"/>
Registration Status	<input type="text" value="Expired"/> ▾
Last Updated by Extract File	<input type="text" value="SAM_SENSITIVE_DAILY_V3"/>
Record Status	<input type="text" value="Changed"/> ▾