

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

PATSY WIDAKUSWARA, *et al.*,

Plaintiffs,

–v.–

KARI LAKE, *et al.*,

Defendants.

Case No. 1:25-cv-1015-RCL

DECLARATION OF GEORGINA YEOMANS

I, Georgina Yeomans, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an Associate General Counsel at the American Federation of State, County, and Municipal Employees, AFL-CIO. I am personally familiar with the facts set forth in this Declaration and, if called, could testify competently thereto.
2. Exhibit A to this declaration is a screenshot of a post that Kari Lake made on the social media website “X.”
3. Exhibit B to this declaration is a copy of an email sent from USAGM to employees that was shared with me by a current USAGM employee.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Washington, D.C. on February 26, 2026.

s/Georgina Yeomans
Georgina Yeomans

Exhibit A

← Post



Kari Lake ✓
@KariLake



Good Morning! Employees of [@USAGM](#), please check your email. Have a great day!



Kari Lake ✓ @KariLake · 22h

Announcement coming tomorrow regarding one of our continued efforts to modernize and right size @USAGM

Stay tuned...

7:42 AM · Feb 26, 2026 · 76.2K Views



38



102



440



7



Read 38 replies

Exhibit B



USAGM Deferred Resignation Program – TIME SENSITIVE

HR Customer Service <HRCustomerService@usagm.gov>
Cc: HR Customer Service <HRCustomerService@usagm.gov>

Thu, Feb 26, 2026 at 7:38 AM



Greetings!

As part of the broader workforce reforms initiated by President Trump, the federal government is undergoing significant restructuring to enhance efficiency, accountability, and performance. In consideration of these reforms and based on recent OPM guidance, the agency is offering another opportunity for employees to voluntarily transition out of federal service through the Deferred Resignation Program (DRP). This program will be available from February 26 through March 9, 2026. Employees who choose to participate in the DRP will retain full pay and benefits and will be exempt from in-person work requirements until September 5, 2026, unless they choose to depart earlier.

We recognize that this is a significant decision, and we encourage employees to review the [Frequently Asked Questions](#).

The Agency understands that an important factor is its planned reduction-in-force (RIF). The RIF noticed in August 2025 is currently suspended due to court order, **and the Agency still intends to carry out a significant RIF** as soon as we are able. Further, the Agency intends to continue and finalize its planned efficiency and modernization efforts in compliance with the President's Executive Orders.

Finally, all employees, including those on administrative leave, remain subject to ethics laws and regulations that apply to federal employees for as long as they are employed by the agency. This includes the requirement to obtain agency approval for outside employment.

If you decide to apply for the DRP, please **type the word "Resign – Your Full Legal Name" in the subject line** of your email and send it to hrcustomerservice@usagm.gov. If you are eligible for retirement, you may also type the words **"Resign and Retire – Your Full Legal Name"** in the subject line.

Notice and Disclaimer: You are not guaranteed approval for this program. Your approval for the Deferred Resignation Program offered in this email is subject to Agency discretion and you may be denied based on mission requirements, workload demands, or other operational needs of the Agency. Employees who apply will be notified individually regarding the status of their application.

You may submit your request from either your work email address or personal email address. For any questions, please contact our Office of Human Resources (OHR) customer service team at hrcustomerservice@usagm.gov.