

EXHIBIT A

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

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, et al.,

Defendants.

Civil Action No. 25-1015 (RCL)

DECLARATION OF DAVID KOTZ

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

1. I have been detailed to the position of Chief Management Officer (CMO) at the U.S. Agency for Global Media (USAGM) since February 26, 2026.
2. I make the following statements based upon my personal knowledge and information provided to me in my official capacity.
3. On March 17, 2026, the U.S. District Court for the District of Columbia issued an order directing USAGM to return hundreds of employees who had been placed on administrative leave to work by March 23, 2026, a period of six calendar days.
4. USAGM's Human Resources system reflects a total of 803 employees on the rolls. Of these, 319 employees are in active status, while 484 employees are on administrative leave. It is these 484 employees whom the Court's order directs be returned to work by March 23, 2026.

5. USAGM immediately began developing a plan to assess its ability to comply with this Order and return employees on administrative leave to work as soon as practicable. To that end, USAGM has developed a detailed Reconstitution Plan that outlines a phased, risk-managed approach to reinstate all 484 employees while ensuring continuity of mission-critical operations and safeguarding agency systems and infrastructure.
6. USAGM determined it has the capacity to onboard approximately 70 employees per week. The plan sequences the return of personnel based on operational necessity.
7. A critical prerequisite to returning any employee to work is the reissuance of a Personal Identity Verification (PIV) card, which is required for both system and physical access to USAGM facilities and networks. The Office of Security is responsible for managing this process. The Credentialing Office is capable of processing a maximum of three (3) employees per hour, between the hours of 9:00 a.m. and 3:00 p.m. At that rate, USAGM can credential no more than 18 employees per day. Issuing PIV cards to all 484 employees on administrative leave will therefore require many weeks and cannot be accomplished by March 23, 2026.
8. In addition to security credentialing, the Human Resources office must complete a number of steps before each returning employee can resume duties. Once the Office of Security clears an individual, HR must send formal return-to-duty communications that specify, among other things: (a) whether the employee will work on-site or in a remote capacity; (b) where to report to collect their PIV card and what identification to present; (c) where to retrieve Government Furnished Equipment (GFE); (d) the employee's assigned workspace, if returning on-site; (e) union notification where applicable; and (f) instructions for completing

a new telework or remote work agreement for those returning remotely. These steps must be individualized for each of the 484 employees.

9. Reinstating approximately 484 employees also creates significant challenges for the Office of the Chief Information Officer with respect to government-furnished equipment (GFE), particularly laptop computers. Constraints include limited device inventory and potential delays in procuring or refurbishing equipment, as well as IT capacity limitations in imaging, configuring, and securing devices. Logistics are further complicated by a geographically dispersed workforce. Critically, equipment issuance is dependent on PIV card issuance and system access. IT cannot fully equip employees until security credentialing is complete.
10. Reestablishing workspace for the 484 returning employees presents additional challenges, particularly where office space has been reduced or reconfigured. Existing facilities may not support a rapid, full-scale return without creating space constraints or operational disruptions.
11. Additionally, USAGM has a new Acting CEO as of March 12, 2026. The agency is simultaneously managing a leadership transition while being directed to execute a large-scale personnel reinstatement within an extremely compressed timeframe. Directing the agency to reinstate 484 employees within six calendar days places significant competing demands on agency leadership and staff at precisely the moment when resources and attention must also be devoted to the leadership transition itself. The order, if enforced on the current timeline, could thus interfere with the Acting CEO's ability to execute his responsibilities and develop a coherent, considered plan for the agency going forward.
12. Full compliance with the Court's order by March 23, 2026 is not operationally feasible.

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

Executed on March 19, 2026.

David Kotz