

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

MICHAEL ABRAMOWITZ *et al.*,

*Plaintiffs,*

–v.–

KARI LAKE, in her official capacity as Senior Advisor to  
the Acting CEO of the United States Agency for Global  
Media;

VICTOR MORALES, in his official capacity as Acting  
CEO of the United States Agency for Global Media;

and

UNITED STATES AGENCY FOR GLOBAL MEDIA,

*Defendants.*

Case No. 1:25-cv-00887-RCL

**[PROPOSED] BRIEF OF FORMER U.S. FOREIGN POLICY AND NATIONAL  
SECURITY OFFICIALS AND OTHER EXPERTS ON PUBLIC DIPLOMACY  
AS AMICI CURIAE IN SUPPORT OF PLAINTIFFS**

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## **INTERESTS OF AMICI**

Amici are former U.S. foreign policy and national security officials who have served in Republican and Democratic Administrations as well as experts on national security and public diplomacy. They have disagreed and continue to disagree about many aspects of U.S. foreign policy. Some believe Voice of America needs to be reformed and modernized to be more effective in addressing the new challenges in the world. But they are united in their belief, based on their government service and on their varied experiences in international affairs outside government, that Voice of America is playing an important role in advancing U.S. national security and should be allowed to continue to support America's position in the world.

## **INTRODUCTION**

For more than 80 years, under Administrations of both parties, Voice of America (VOA) has steadfastly advanced core U.S. foreign policy goals. Those goals have included: aiding citizens of U.S. adversaries in their efforts to gain the right to self-government; strengthening U.S. alliances and building popular support around the globe for the United States as the leader of the Free World; promoting respect for human rights, freedom of the press, and individual freedoms, including freedom of religious conscience and freedom of speech; and advancing recognition of U.S. leadership in scientific, technological, and cultural innovation.

The U.S. government created VOA in 1942 as a tool to achieve America's national security imperative of the day: defeating fascism, both in Europe and in Asia. VOA quickly demonstrated its effectiveness. Its broadcasts both supported popular resistance movements operating behind enemy lines and bolstered the confidence of tens of millions living under Axis despotism that the United States and its allies would fight unwaveringly for their liberation. We briefly recount the story of VOA's origins and World War II contributions in Part I below.

With the unfolding of the Cold War not long after the end of World War II, VOA's role in advancing U.S. national security became all the more important. America's Communist enemies placed a high value on anti-Western propaganda, both at home and abroad. In the decades-long struggle against that propaganda, VOA wielded two powerful weapons: truthful news reporting and accurate accounts of America's great contributions to fields that benefit all of humanity – science, technology, literature, music, and the visual arts, among others. Recognizing the value of VOA's contributions during that half-century fight against Communism around the globe, each successive President and each successive Congress expanded VOA's budget and broadened VOA's reach. There is perhaps no greater testament to the important role VOA played in strengthening U.S. national security during the Cold War than the extraordinary lengths to which the Soviet Union and its allies went to prevent VOA's programming from reaching their citizens. We offer two examples of those efforts as part of our account of VOA's Cold War work in Part II.

Since the end of the Cold War, two transformations in global affairs have made VOA's contributions to U.S. national security still more essential.

The first transformation is the reordering of the geopolitical map. The relatively fixed battle lines of the Cold War have been replaced by a more chaotic array of international arrangements and a greater variety of threats to U.S. national security. While the Cold War saw battles fought in many places, nearly all of them pitted Soviet Communism against liberal democracy. Today, the United States and its allies face hostile governments and movements animated not by one ideology, but by many: the People's Republic of China's combination of a market-aided one-party state with a long tradition of anti-Western nationalism; various forms of Islamic radicalism, exemplified by Iran and its proxies; various species of reactionary nationalism, as in Putin's Russia, Lukashenko's Belarus, and the military junta in Myanmar; and

various kinds of post-Communist anti-Western leftism, exemplified by the governments of Venezuela and Nicaragua.

The second transformation is the result of one of America's greatest inventions—the Internet. Within a few years of the collapse of the Berlin Wall in 1989, the Internet had been converted from a government-funded computer-science experiment into an unprecedented globe-spanning network of communication and information distribution. Because of its relatively open architecture, the Internet held out the promise in its early years of giving a decisive advantage to advocates of freedom. But authoritarian governments quickly recognized that threat and began to develop sophisticated methods to make use of the Internet for their own purposes. They devised means of restricting their own citizens' access to uncensored online content,<sup>1</sup> and they developed increasingly sophisticated tools for using the Internet as a medium for their own propaganda, both at home and abroad.<sup>2</sup> These methods, rightly dubbed “computational propaganda,”<sup>3</sup> use social media to carry on high-tech “disinformation” efforts—a collection of strategies invented by the Soviet secret services in 1920s for dishonestly swaying public opinion.<sup>4</sup> U.S. adversaries—above all, the members of what some have called the Axis of Autocracies, China,

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<sup>1</sup> See, e.g., Andrei Soldatov and Irina Borogan, *The Red Web: The Struggle Between Russia's Digital Dictators and the New Online Revolutionaries* (2015) (documenting the Russian government's efforts to control its citizens' Internet access); Freedom House, Freedom on the Net 2024: China, <https://freedomhouse.org/country/china/freedom-net/2024> (similar for China); Cathryn Grothe, “Countering Iran's Brand of Digital Authoritarianism,” Just Security (Oct. 21, 2022), <https://www.justsecurity.org/83633/countering-irans-brand-of-digital-authoritarianism/> (similar for Iran).

<sup>2</sup> See, e.g., Council on Foreign Relations, *Confronting Reality in Cyberspace: Foreign Policy for a Fragmented Internet* 15-22 (2022), [https://www.cfr.org/report/confronting-reality-in-cyberspace/download/pdf/2022-07/CFR\\_TFR80\\_Cyberspace\\_Full\\_SinglePages\\_06212022\\_Final.pdf](https://www.cfr.org/report/confronting-reality-in-cyberspace/download/pdf/2022-07/CFR_TFR80_Cyberspace_Full_SinglePages_06212022_Final.pdf).

<sup>3</sup> Samuel Wooley and Philip N. Howard, *Computational Propaganda: Political Parties, Politicians, and Political Manipulation on Social Media* (2018).

<sup>4</sup> See generally Thomas Rid, *Active Measures: The Secret History of Disinformation and Political Warfare* (2016).

Russia, Iran, and North Korea—have poured ever-increasing resources into updating methods of spreading disinformation for the Internet age, combining those methods with their longer-standing strangleholds over radio and television inside their borders. In the face of these efforts, VOA’s honest and compelling reporting has become integral to telling America’s story to the world.

In making sense of today’s complex geopolitical situation, nearly the entire population of our planet now turns to online sources to understand events. In this environment, America’s authoritarian adversaries recognize that controlling public opinion is vital both to staying in power and to challenging the United States. In order to advance its strategic interests, the United States must become more effective at fighting what U.S. officials and others have candidly recognized are new forms of information warfare.<sup>5</sup> In that kind of warfare, VOA’s journalists and broadcasters serve on America’s front lines. VOA reaches hundreds of millions of people around the world, offering them accurate and compelling reporting in their own languages. Nothing else can compare in sharing America’s side of the story—the side of truth and of individual freedoms. In part III below, we describe how, in today’s world of online information battles, VOA’s work contributes directly to strengthening the national security of the United States.

In light of VOA’s continuing importance in sharing the promise of America and the values of individual freedom and democratic self-government with audiences around the world, the undersigned Amici support Plaintiffs’ request for a preliminary injunction.

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<sup>5</sup> See generally Richard Stengel, *Information Wars: How We Lost the Global Battle Against Disinformation and What We Can Do About It* (2019); Peter Pomerantsev, *This Is Not Propaganda: Adventures in the War Against Reality* (2019); Billyana Lilly, *Russian Information Warfare: Assault on Democracies in the Cyber Wild West* (2022).

## ARGUMENT

### I. VOA Was Created During World War II To Support America's Fight Against Fascism

Created under the auspices of the Foreign Information Service in early 1942, VOA began its life with a tiny staff broadcasting from above a Chrysler dealership in Manhattan. But within a few months, VOA was on the air 24 hours a day in English, French, German, and Italian. By the middle of 1944, now operating under the auspices of the Office of War Information, VOA was reaching audiences in more than 40 languages.<sup>6</sup>

VOA's musical signature was a "spritely small band rendition of 'Yankee Doodle,'" orchestrated by the noted composer Virgil Thompson.<sup>7</sup> That signature fit with VOA's animating purpose: helping the United States and its allies win the war. As the VOA News Branch stylebook, "This Is Your Job," explained, VOA was not in the news business "because news is an end in itself. The United States is in the midst of a serious struggle for the mind of mankind and the only purpose of the News Branch as well as the entire Voice of America is to contribute to winning that struggle."<sup>8</sup> In order to achieve that goal of advancing the war effort, VOA had to win the trust of its listeners, and that required honest news reporting. As the host of VOA's first broadcast told his listeners, "We bring you Voices from America. Today, and daily from now on, we shall speak to you about America and the war. The news may be good for us. The news may be bad for us. But we shall tell you the truth."<sup>9</sup>

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<sup>6</sup> This account of VOA's work during World War II is drawn principally from two sources: Alan Heil, *Voice of America: A History* ch. 2 (2003) (hereafter "Heil"), and Holly Cowan Shulman, *The Voice of America: Propaganda and Democracy, 1941-1945* (1990).

<sup>7</sup> Heil 38.

<sup>8</sup> Heil 32.

<sup>9</sup> *Id.*

Audiences responded enthusiastically. From Cannes, France, then occupied by the Italian army, one listener wrote in 1942: “You in America cannot imagine how even a few minutes of news from America, heard by a Frenchman, is spread around. An hour after it is heard, hundreds, thousands, know the truth.”<sup>10</sup> On the other side of the world, Filipino guerrillas, including Ramon Magsaysay, who would go on to become the President of the Philippines, similarly attested that they had listened to VOA daily.<sup>11</sup>

## **II. During the Cold War, VOA Made Important Contributions to the West’s Struggle Against Communism Around the Globe**

With World War II won, it was not immediately clear whether VOA would continue to broadcast. But the United States soon faced a more extended struggle for freedom: the Cold War against the Soviet Union and against the spread of Soviet-style Communism elsewhere around the world. In that decades-long struggle, under administrations of both parties, VOA played a powerful role in countering Communist propaganda with accurate reporting and engaging cultural programming.

By 1950, it was clear to President Truman and his senior advisers that the United States needed a forceful response to Soviet propaganda and effective means for penetrating the “static curtain” that Soviet jamming had thrown up to block accurate information from reaching citizens in the Soviet bloc. In March 1950, Undersecretary of State James Webb urged the President “to step up every means of getting understanding of our peaceful purposes through the Iron Curtain.” The next month, speaking at the annual meeting of the American Society of Newspaper Editors, President Truman announced what he called a “Campaign of Truth” to make good on Webb’s

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<sup>10</sup> Heil 39

<sup>11</sup> Heil 44.

recommendation. In that campaign, VOA was to take a leading role, receiving expanded appropriations both for its broadcasting and for developing counter-jamming equipment.<sup>12</sup>

Nearly 20 years later, with President Nixon in the White House and Henry Kissinger serving as National Security Advisor, the United States remained committed to ensuring that VOA could evade Soviet jamming and bring accurate information to the millions living under Communism. Responding to a request from President Nixon in June 1969, for example, Kissinger laid out a menu of possible strategies for ensuring VOA's voice could still be heard.<sup>13</sup>

And in the 1980s, President Reagan, himself a former broadcaster, spoke frequently and forcefully about the importance of VOA's work. In 1984, addressing the need for additional investments in VOA, he stated that "[t]he Voice of America has been a strong voice for truth." To ensure that VOA "could be heard more clearly by many more people around the globe," he explained, his administration had "made the same commitment to modernizing the Voice of America that President Kennedy brought to the space program."<sup>14</sup>

### **III. VOA's Contributions to U.S. Global Interests Have Become All the More Important In the Post-Cold War World**

Today's VOA would be unrecognizable to someone familiar with the shortwave radio version founded in 1942. VOA now shares accurate news and thought-provoking stories in every communications format, from television to social media; in over 100 countries; and in 49 languages, from Afan Oromo (Northeast Africa) to Vietnamese.<sup>15</sup> On a weekly basis, these

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<sup>12</sup> This account draws on David F. Krugler, *The Voice of America and the Domestic Propaganda Battles, 1945-1953*, ch. 4 (2000).

<sup>13</sup> Memorandum From the President's Assistant for National Security Affairs (Kissinger) to President Nixon, June 30, 1969, Re: Soviet Jamming of the Voice of America and our Response, <https://history.state.gov/historicaldocuments/frus1917-72PubDipv08/d26>; see Michael Nelson, *War of the Black Heavens: The Battles of Western Broadcasting in the Cold War* (1997).

<sup>14</sup> Heil 116.

<sup>15</sup> See U.S. Agency for Global Media (USAGM), FY 2024 Agency Performance Report at 2, [USAGM-FY-2024-Agency-Performance-Report\\_Final\\_1-17-25\\_WebVersion.pdf](#) (hereafter

broadcasts reach at least 361 million adults outside the U.S. and China (for which reliable audience estimates are unavailable).<sup>16</sup> Moreover, by reporting in so many languages, VOA offers an accessible local alternative to government-controlled media and foreign propaganda.

VOA's broad reach and reliable content were critical during the Cold War, but they are even more important today. Now, threats to U.S. national security come not only from Russia and its satellites but also from Chinese imperialism, Iran's terrorist theocracy, anti-Western posturing in authoritarian countries such as North Korea and Venezuela, the spread of disinformation around the globe, and many other sources. The news and information shared by VOA helps push back on these countries' narratives and promote an informed global public—"expand[ing] freedom of information and expression; and [s]har[ing] America's democratic experience and values,"<sup>17</sup> with audiences that might otherwise hear only propaganda from whichever domestic or foreign authority controls their local airwaves and Internet feeds.

#### **A. VOA's Current Footprint**

In these challenging times, the world's appetite for accurate news and information is at an all-time high, and VOA has continued to meet the moment by expanding its reach. Over FY 2024, VOA's weekly audience grew by eight million users, to 361 million. Average weekly website visits rose by approximately 900,000, to 16.4 million. Demand for censorship circumvention tools—which allow audiences in repressive media environments to access online content from VOA—surged over the same period.<sup>18</sup> In the last fiscal year alone, for example,

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"FY 2024 Report"); U.S. Agency for Global Media, FY 2024 Congressional Budget Justification at 1, [https://www.usagm.gov/wp-content/uploads/2024/03/USAGMBudget\\_FY25\\_CBJ\\_03-08-24-1.pdf](https://www.usagm.gov/wp-content/uploads/2024/03/USAGMBudget_FY25_CBJ_03-08-24-1.pdf) (FY 2024 Budget Justification); VOA, VOA Languages, <https://docs.voanews.eu/en-US-INSIDE/2019/08/01/5b24dbec-c11e-450e-b795-2a7d85cbb75e.pdf>.

<sup>16</sup> FY 2024 Report at 2, 8, 9.

<sup>17</sup> *Id.* at 4.

<sup>18</sup> *Id.* at 13, 46, 44.

video viewership on VOA Mandarin’s website went up 72%, largely due to Internet searches and censorship circumvention. Article readership on VOA Russian increased by 20%, or 36.4 million views, over the same period, also thanks to circumvention tools.<sup>19</sup>

Importantly, VOA has maintained its credibility worldwide even as it has grown its reading, viewing, and listening audiences. In FY 2024, 90% of weekly users in countries as varied as Bangladesh, Guatemala, Kosovo, and Niger reported that they trust VOA content. And the self-reported trust levels in key target countries such as Ukraine are even higher.<sup>20</sup> VOA is also winning the trust contest in key markets. In Afghanistan, for example, VOA is the most-trusted news brand.<sup>21</sup>

VOA does not work alone, instead partnering with local affiliates to extend its influence. Across Africa, for instance, VOA works with over 1500 affiliates; in East Asia and the Pacific, 1254; in Eurasia, nearly 1000; in Latin America, 744; and in South and Central Asia, 99.<sup>22</sup>

## **B. VOA and the Fight against Chinese Repression and Expansionism**

Unlike during the Cold War era, Russia is no longer the sole nation whose global ambitions threaten the continued vitality of liberal democracies and of press and religious freedoms. China, too, ruthlessly controls the press at home while spreading propaganda and expanding its influence outside its borders, notably in the global South. The reliable news and information provided by VOA serves at least five important functions in opposing Beijing’s efforts: debunking and providing a counternarrative to misinformation within China; exposing

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<sup>19</sup> VOA FY 2024 Digital Performance Report, LINK.

<sup>20</sup> *Id.* at 18.

<sup>21</sup> Testimony of Michael Abramowitz, Director, Voice of America, House Foreign Affairs Committee, Subcommittee on Oversight and Accountability (July 9, 2024), <https://docs.house.gov/meetings/FA/FA17/20240709/117493/HHRG-118-FA17-Wstate-AbramowitzM-20240709.pdf>.

<sup>22</sup> *Id.*

China's disinformation techniques; documenting Chinese expansionism; countering Chinese influence abroad by sharing U.S. culture and values with the same audiences; and finally, amplifying the voices of Chinese dissidents within and outside the country.

On the first point, VOA content reaches citizens within China despite heavy censorship, providing them with accurate reporting that helps to shape their worldview and instills the values of "freedom and human dignity." Perhaps just as important, millions in China have "learned English through Voice of America," all while listening to reports that "contradict[] the Chinese Communist Party's narratives" and "imagin[ing] a world where life, liberty and the pursuit of happiness [are] held as ideals."<sup>23</sup>

VOA's reporting about the timeline and severity of the COVID pandemic in China, and Beijing's repressive crackdown in response, offers a compelling example of this work to counter Chinese misinformation. From 2019 to 2020, VOA articles in English and Mandarin questioned China's official COVID infection numbers and its timeline of the pandemic. During this period, VOA's viewership within China soared, with over 68 million visits to VOA Mandarin's website from April 2019 to April 2020, including 4.5 million views of articles related to COVID.

Later in the pandemic, VOA added reporting on the virus's political repercussions for the Chinese government. VOA China's award-winning 2024 podcast, *My Voice, Our Story: The Young Generation with White Paper in Hand*, for example, covered the White Paper Movement, a series of spontaneous street protests against China's strict COVID controls.<sup>24</sup> But for the VOA's reporting, the world might have remained largely ignorant of this movement—"thought

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<sup>23</sup> Li Yuan, *Trump Could Hand China a 'Strategic Victory' by Silencing Voice of America*, N.Y. Times (Mar. 28, 2025), <https://www.nytimes.com/2025/03/28/business/media/china-voice-of-america-radio-free-asia.html>.

<sup>24</sup> FY 2024 Report at 15.

to be the largest [protest in China] since the 1989 pro-democracy Tiananmen Square demonstrations”—because Chinese authorities censored all online reporting about it and “silenced those who dared to document or commemorate it.”<sup>25</sup>

Anyone questioning the significance of the news and counternarrative that VOA provides to Chinese audiences need look no further than the Chinese state-run media’s response to the effort to shutter VOA. As numerous independent journalists have reported, Chinese state media and pro-China commentators are “revel[ing]” in the possible demise of VOA.<sup>26</sup>

But VOA’s work is not limited to correcting misinformation within China; VOA content also exposes the insidious mechanisms by which China (and similar regimes) are able to spread their disinformation around the world. In June 2023, for example, VOA China reported that certain Mandarin-language responses by Google’s AI assistant, Gemini, “were indistinguishable from Beijing’s official propaganda.” Citing cybersecurity analysts, this report suggested the data used to train Gemini likely came from Chinese social media, which is “flooded with [the Chinese government’s] preferred narratives.” A VOA source characterized the findings as a “reminder that generative AI tools influenced by state-controlled information sources could serve as force multipliers for censorship.”<sup>27</sup>

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<sup>25</sup> Jessie Lau, China erases memory of ‘white paper’ protests in further threat to journalism, *The Guardian* (May 1, 2024), <https://www.theguardian.com/global-development/2024/may/01/chinas-authorities-erase-memory-white-paper-protests-in-tightening-of-censorship-press-freedom>.

<sup>26</sup> Erin Hale, Chinese state media revel in demise of Voice of America, Radio Free Asia, Aljazeera (Mar. 19, 2025); *see also, e.g.*, Kate Lamb, Chinese state media celebrates Trump’s cuts to Voice of America and Radio Free Asia, *The Guardian* (Mar. 18, 2025); Nectar Gan, ‘How gratifying’: Cheers in China as Trump dismantles Voice of America, *CNN* (Mar. 17, 2025).

<sup>27</sup> Wenhao Ma, Google AI Gemini parrots China’s propaganda, *VOA* (Jun. 13, 2024), <https://www.voanews.com/a/google-ai-gemini-parrots-china-s-propaganda/7654874.html>.

VOA's third important role in addressing the threat from China is to document Beijing's growing ambitions in the global South. For example, numerous recent VOA reports document Chinese infrastructure investment across Africa.<sup>28</sup> As VOA has also noted, China's ambitions extend not only to dominating strategic infrastructure development but also to shaping African popular culture: China aspires to capture hearts and minds, with recent investments aimed at "restructuring African music, film and digital content creation."<sup>29</sup>

Fourth, VOA itself stands at the forefront of the U.S. effort to combat China's influence outside its borders. VOA's English to Africa service, for example, reaches all 54 countries on the continent, via radio, television, web, and social media. The service's broadcasts and posts cover a wide range of topics, from science and technology to health, arts, entertainment, and sports.<sup>30</sup>

Finally, fifth, VOA amplifies the voices of dissidents from the Chinese diaspora and reveals threats to their security. In 2024, for example, VOA publicized the work of activist Liu Dongling, a Chinese citizen then seeking asylum in Denmark, to lead the "Ban the Great Firewall" campaign against China's censorship of online content, and to document human rights violations in China.<sup>31</sup> Earlier VOA reporting chronicled the Dutch Chinese community's requests

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<sup>28</sup> See, e.g., Agence France-Presse/VOA, 5 key Chinese 'Belt and Road' projects underway in Africa (Sept. 1, 2024), <https://www.voanews.com/a/key-chinese-belt-and-road-projects-underway-in-africa/7767507.html> (noting Chinese companies signed contracts in Africa worth more than \$700 billion between 2013 and 2023); Carol Van Dam Falk, US Invests in Africa in Effort to Counter Chinese Influence, VOA (Dec. 14, 2023), <https://www.voanews.com/a/us-invests-in-africa-in-effort-to-counter-chinese-influence-7399128.html>.

<sup>29</sup> VOA Africa, Exploring the impact of Chinese investments on African entertainment, DATE, <https://www.youtube.com/watch?v=IX8yVFPLA4I>.

<sup>30</sup> VOA, VOA Broadcasting in English to Africa, <https://www.insidevoa.com/p/6580.html>.

<sup>31</sup> William Yang, Chinese activist risks deportation after Denmark rejects asylum bid, VOA (Sept. 7, 2024), <https://www.voanews.com/a/chinese-activist-risks-deportation-after-denmark-rejects-asylum-bid/7775272.html>.

that the Dutch government shut down Chinese “police stations” in the Netherlands, which were used to “harass dissidents.”<sup>32</sup> And in 2017, VOA publicized the extraordinary documentary “Human Flow” by Chinese dissident Ai Weiwei, which highlights the plight of refugees from around the world.<sup>33</sup>

### **C. VOA and the Struggle against Teheran’s Terrorist Theocracy**

The risk to peace and stability posed by Iran’s efforts to spread negative narratives and misinformation about America’s goals and policies in the Middle East adds considerable complexity to the national security landscape. On this front, too, VOA plays critical roles: explaining the benefits of U.S. initiatives, such as the Abraham Accords; documenting Iran’s atrocities; exposing differences of opinion within Iran; and amplifying the voices of opponents of the regime.

On the first point, in exclusive interviews with VOA Persian, several prominent U.S. foreign policy experts recently discussed major regional developments, with a particular focus on the Abraham Accords and broader Middle East security. Ellie Cohan, currently a senior fellow at the Independent Women’s Forum and former U.S. State Department official under President Trump, emphasized the importance of maintaining maximum pressure on the Islamic Republic while fully supporting the Iranian people. She contributed a chapter on the Middle East, Israeli security, and the Iranian threat in a newly published policy guide by the America First Policy Institute. Patrick Clawson, director for research at the Washington Institute for Near East Policy, and Ilan Berman, vice president of the American Foreign Policy Council, also shared insights in

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<sup>32</sup> Agence France-Presse/VOA, Netherlands Tells China to Close ‘Police Stations’ (Nov. 1, 2022), <https://www.voanews.com/a/netherlands-tells-china-to-close-police-stations-/6815747.html>.

<sup>33</sup> Penelope Poulou, Ai Weiwei’s ‘Human Flow’ Highlights Refugee Plight Around the World, VOA (Oct. 18, 2017), <https://www.voanews.com/a/ai-weiwei-on-human-flow-documentary/4076059.html>.

their interviews on the Accords. Berman critically analyzed the Biden administration's foreign policy approach, particularly regarding Iran's role in regional destabilization. Collectively, these experts stressed the importance of expanding the Abraham Accords and confronting the Islamic Republic's influence as a cornerstone of future U.S. and Israeli policy in the region.<sup>34</sup>

Examples of VOA's coverage of Iranian atrocities include its stories on a series of mysterious mass poisonings in 2022-2023, in which thousands of Iranian school girls were reportedly deliberately poisoned by unidentified toxic gas, possibly in an effort to discourage girls' education,<sup>35</sup> and VOA's 2022-2023 reporting on Iran's practice of "hostage diplomacy"—i.e., taking hostages to coerce payments or prisoner swaps from the United States or U.S. allies.<sup>36</sup> VOA also exposed Iran's efforts to shift global opinion after Hamas's October 7, 2023, murderous attack on towns and kibbutzim in southern Israel by allegedly coercing Iranian Jews to stage anti-Israel rallies in five large Iranian cities.<sup>37</sup> VOA has also been an important source of unbiased information on the Gaza war and Israel-Palestine conflict, including presenting in local languages a broader range of perspectives than is generally heard in Muslim-majority countries such as Iran or Indonesia.

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<sup>34</sup> VOA, One Vision (Feb. 5, 2024), <https://ir.voanews.com/a/7471604.html> <https://ir.voanews.com/a/7461472.html> <https://ir.voanews.com/a/7698885.html>.

<sup>35</sup> E.g., Agence France-Presse/VOA, 20 Iranian Schoolgirls Hospitalized After Suspected Poisoning (Apr. 4, 2023), <https://www.voanews.com/a/iranian-schoolgirls-hospitalized-after-suspected-poisoning-/7036243.html>.

<sup>36</sup> Henry Ridgwell, Amid British-Iranian Prisoners' Homecoming, West Grapples With Tehran's 'Hostage Diplomacy,' VOA (Mar. 17, 2022), <https://www.voanews.com/a/amid-british-iranian-prisoners-homecoming-west-grapples-with-tehran-s-hostage-diplomacy-/6489945.html>.

<sup>37</sup> E.g., Michael Lipin, EXCLUSIVE: US Calls Iran's Apparent Coercion of Minority Jews into Staging Anti-Israel Rallies 'Abhorrent,' VOA (Nov. 5, 2023), <https://www.voanews.com/a/exclusive-us-calls-iran-s-apparent-coercion-of-minority-jews-into-staging-anti-israel-rallies-abhorrent-/7342220.html>.

VOA reports are also helpful in exposing divisions of opinion within repressive regimes like that in Tehran—divisions that could be critical to U.S. policy development. For example, VOA’s coverage of the same Hamas attacks “captured rare perspectives from Iranian citizens who criticized Hamas—a sentiment repressed within Iran.”<sup>38</sup> VOA Persian had an exclusive featurette that focused on the sentiments of the ordinary Iranian citizens on the Hamas-Israel war. VOA Persian interviewed people inside the country through undercover reporters. Contrary to the Islamic Republic’s propaganda and decades-long disinformation campaign, which claims nationwide support for Palestinian militant groups, the Iranians who spoke to VOA considered Hamas to be the wrongdoer and opposed the Iranian regime’s costly support of the group.<sup>39</sup>

Finally, VOA has worked to expand the audience for Iranian dissidents. Recent reporting, for instance, covers Iran’s Woman, Life, Freedom movement, a protest movement launched in September 2022 after the murder by Iranian religious police of a young Iranian woman, Mahsa (Jina) Amini, who had been arrested for allegedly wearing the hijab improperly.<sup>40</sup> Afsoon Najafi, whose sister Hadis Najafi was also killed during that movement, thanked VOA for its coverage of associated events:

“[VOA] has been essential in amplifying my cry for justice. We have followed [VOA] for many years through satellite broadcasts. VOA has been a crucial source of information for us Iranians, allowing us to see and hear about issues that were either censored or entirely ignored by state-controlled media under the Islamic Republic’s laws. I can confidently say that [VOA] is one of the few media outlets that presents the truth without censorship or bias. My personal experience with them began when VOA Persian covered the news of my sister’s killing. They later helped us save my brother from being kidnapped by the Islamic Republic. VOA journalists have been by our side every moment, ensuring our stories are heard.

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<sup>38</sup> FY 2024 Report at 25.

<sup>39</sup> VOA, Special Coverage, Iranian’s opinion: Islamic Republic’s role in the conflict between Israel and Hamas (Nov. 21, 2023), <https://ir.voanews.com/a/7364368.html>.

<sup>40</sup> E.g., Agence France-Presse, Freed Researcher Says Anti-Hijab Protests Changed Iran, Its Prisons, VOA (Nov. 4, 2023), <https://www.voanews.com/a/freed-researcher-says-anti-hijab-protests-changed-iran-its-prisons-/7341858.html>.

VOA Persian late-night coverage of the kidnapping of my brother was vital in keeping him safe and reuniting [him] with our family in Iran. The Islamic Republic is vehemently opposed to [VOA] and has done everything in its power to block access to it. ... Without [VOA], many voices, cries for justice, and reports of atrocities would be silenced.”<sup>41</sup>

Likewise, soon after the inauguration of President Trump, VOA reported on a Paris rally by Iranian dissidents who hoped that the new U.S. Administration’s “maximum pressure” campaign would catalyze “a better future” in their home country.<sup>42</sup>

VOA has also exposed the threat to the United States and our allies posed by Iranian proxies, such as Hamas. As noted, for example, VOA documented Hamas’ October 7, 2023, attack in southern Israel, providing then-current estimates of the death toll and the number of kidnapped Israelis.<sup>43</sup> Over the intervening year and a half—indeed, until just before the actions challenged here—VOA’s reporting on Gaza continued apace, with the most recent reporting covering the early days of the ceasefire that has since broken down.<sup>44</sup>

#### **D. VOA’s Coverage of Anti-Western Moves in North Korea and Venezuela**

VOA’s works to expose the anti-Western activities of authoritarian regimes in countries such as North Korea and Venezuela. Just after the Hamas’s October 7, 2023 attack, for example, VOA documented the group’s ties to North Korea by sharing evidence that North Korea had supplied some of the weapons used by Hamas terrorists. The report explained that Hamas made

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<sup>41</sup> Declaration of Afsoon Najafi, attached in Appendix B.

<sup>42</sup> Reuters, *Emboldened by Trump, Iranian dissidents demand overthrow of rulers*, VOA (Feb. 8, 2025) (internal quotation marks and citations omitted), <https://www.voanews.com/a/emboldened-by-trump-iranian-dissidents-demand-overthrow-of-rulers-/7968042.html>.

<sup>43</sup> VOA, *Hamas Attacks Israel, Killing Hundreds; Dozens Kidnapped* (Oct. 7, 2023), <https://www.voanews.com/a/hamas-attacks-israel-killing-hundreds-dozens-kidnapped/7301265.html>.

<sup>44</sup> *E.g.*, VOA News, *Trump envoy describes recent meeting with Hamas as ‘very helpful’* (Mar. 9, 2025), <https://www.voanews.com/a/israel-says-it-is-cutting-off-its-electricity-supply-to-gaza/8004498.html>.

its anti-tank rockets “us[ing] the rocket propellant engines of the North Korean-made rocket-propelled grenade launcher, the F-7.”<sup>45</sup> The Associated Press and other media organizations picked up VOA’s report, and the South Korean Joint Chiefs of Staff later confirmed the claim.<sup>46</sup> VOA has also documented North Korea’s efforts to evade sanctions by funding infrastructure projects in countries such as Senegal and pocketing the proceeds,<sup>47</sup> as well as the regime’s brutal mistreatment of University of Virginia student Otto F. Warmbier, who died in 2017 after the first Trump administration secured his return to the U.S. from 17 months of captivity in Pyongyang.<sup>48</sup>

With respect to Venezuela, where VOA provides a counterweight to propaganda by President Maduro and his strategic allies in China, Russia, and Iran, VOA’s coverage has been similarly unsparing. Most notably, after the 2024 election in that country, VOA documented the large number of nations (including the U.S.) that recognized opposition leader Edmundo González as the true victor despite the Venezuelan election authority’s ratification of Maduro’s win.<sup>49</sup> At the same time, VOA also explored China’s very different response: full support for Maduro. As VOA explained, Beijing took that position to safeguard its own relationship with

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<sup>45</sup> Ham Ji-ha, Hamas to make new weapons out of North Korea F-7 parts: Israeli military “tens of tens of thousands of North Korean weapons,” VOA (Dec. 29, 2023), <https://www.voakorea.com/a/7416498.html> (in translation).

<sup>46</sup> *Id.*

<sup>47</sup> Ham Ji-ha and Kim Seon-myung, Despite UN Sanctions, North Koreans at Work in Senegal, VOA (Sept. 24, 2019), <https://www.voanews.com/a/africa-despite-un-sanctions-north-koreans-work-senegal/6176412.html>.

<sup>48</sup> Ham Ji-ha, Court Papers Hint at Warmbier’s Treatment in North Korea, VOA (Oct. 27, 2018), <https://www.voanews.com/a/court-papers-hint-at-otto-warmbiers-treatment-in-north-korea/4631497.html>.

<sup>49</sup> Agence France-Presse/VOA, Venezuela ratifies Maduro win as more nations recognize rival as true victor (Aug. 2, 2024), <https://www.voanews.com/a/venezuela-ratifies-maduro-win-as-more-nations-recognize-rival-as-true-victor/7728468.html>.

Venezuela, where China has “financed more than \$60 billion worth of projects” in return for “essential resources ... including crude oil and minerals, through an oil-for-loan model.”<sup>50</sup>

VOA has also covered Iran’s growing influence in Venezuela. In 2023, for example, VOA reported on a fair in Caracas hosted by the Center for Intercultural Exchange in Latin America—which, per VOA and its source, “is a Latin American branch of Iran’s al-Mustafa International University, ... Tehran’s principal institution for recruiting, indoctrinating and training foreign converts to Shi’ite Islam.” The same VOA report also explored Iran’s role in funding—at a cost of close to half a billion dollars, and in spite of the sanctions on both countries—Venezuela’s refurbishment of its largest refining complex, the Paraguana Refining Center.<sup>51</sup>

#### **E. VOA and the Fight against Russian Aggression**

As the Kremlin continues to press its global ambitions, VOA remains essential to combatting them.

Two examples prove the point. First, VOA’s reports on anti-Ukrainian propaganda within Russia, and on the ongoing political, cultural, and personal impacts within Ukraine of Russia’s full-scale invasion, offer Ukrainians a well-trusted source for accurate information about events in their country, while also providing the world a clear and reliable counternarrative to Moscow’s self-serving claims about the war. For instance, while Russian President Vladimir Putin compares “the regime in Kyiv” to “Hitler’s accomplices, the SS men,” VOA’s report notes that Ukrainian President Volodymyr Zelensky was democratically elected, and also that he lost

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<sup>50</sup> Lin Yang, China stands by Maduro in Venezuela to safeguard its investments, VOA (Aug. 3, 2024), <https://www.voanews.com/a/china-stands-by-maduro-in-venezuela-to-safeguard-its-investments/7729148.html>.

<sup>51</sup> Michael Lipin, Why Iran’s Growing Influence in Venezuela Challenges the West, VOA (Mar. 11, 2023), <https://www.voanews.com/a/why-iran-s-growing-influence-in-venezuela-challenges-the-west-/7000632.html>.

relatives in the Holocaust.<sup>52</sup> Similarly, VOA reporting helped to disprove Kremlin claims of Ukrainian involvement in the March 2024 terrorist attack at Moscow’s Crocus City Hall—an attack that VOA, relying on U.S. government sources, instead accurately linked to ISIS.<sup>53</sup>

VOA’s reporting inside Ukraine is equally important, both in providing Ukrainians with information to protect their interests, and in amplifying the voices of Ukrainian activists. In 2023, for instance, VOA exposed Russia’s use of online phishing sites to obtain personal information from Ukrainian soldiers, in what U.S. officials suggested may have been an effort to locate, detain, and deport soldiers’ family members from occupied Ukraine.<sup>54</sup> In the same year, VOA shared the important backstory of Ukraine’s struggle to align itself with Europe rather than Russia, as well as the present-day efforts of longtime pro-European activists in the country.<sup>55</sup> And in 2024, VOA won an award at Cannes for its online documentary “Jamala: Songs of Freedom,” which follows a Ukrainian singer-songwriter and activist in the aftermath of the Russian invasion.<sup>56</sup>

The second example of VOA’s work to combat Russian expansionism concerns the activities of the Wagner Group, the private military force that serves as unofficial arm of the Kremlin. The Wagner Group came to the world’s attention in 2023, when its then-leader,

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<sup>52</sup> VOA, Putin Falsely Claims ‘De-Nazification’ of Ukraine as Pretext for War (Jan. 27, 2024), <https://www.voanews.com/a/ukraine-russia-trade-blame-over-downing-of-russia-plane-carrying-pows/7458993.html>.

<sup>53</sup> FY 2024 Report at 32.

<sup>54</sup> Carla Babb, Russian Scam Sites Obtain Personal Info of Thousands of Ukrainians, VOA (Aug. 31, 2023), <https://www.voanews.com/a/russian-scam-sites-obtain-personal-info-of-thousands-of-ukrainians/7249234.html>.

<sup>55</sup> Lesia Bakalets, Ten Years after Maidan, Ukraine’s Activists Say Their Fight Continues, VOA (Nov. 21, 2023), <https://www.voanews.com/a/ten-years-after-maidan-ukraine-s-activists-say-their-fight-continues-/7364808.html>.

<sup>56</sup> VOA, Jamala: Songs of Freedom (Feb. 24, 2024), <https://www.voanews.com/a/jamala-songs-of-freedom/7498517.html>.

Yevgeny Prigozhin, first “launched an unexpected insurrection” against Russian military leaders and then, shortly thereafter, died in a suspicious plane crash.<sup>57</sup> VOA reporting on the origins of the group reveals “a complex organization involved in security, resource extraction and financial operations spanning the globe.”<sup>58</sup> Per VOA’s reporting, the Wagner Group’s unofficial status has allowed Russia to maintain “plausible deniability of [the Group’s] actions,” which include assisting Russian separatists in Ukraine, backing Bashar al-Assad’s murderous government in Syria’s civil war, planting internationally-banned landmines to support General Khalifa Haftar’s troops in Libya, and supplying weapons to one of the warring parties in Sudan.<sup>59</sup> Reportedly, Wagner has also exchanged its military assistance for stakes in oil and gas fields in Syria and Libya, gold mines in Sudan, and diamond mines in the Central African Republic. Per VOA, these stakes enable Russia to evade international sanctions and develop its strategic reserves.<sup>60</sup>

#### **F. Recent Bipartisan Expressions of Support**

Consistent with its nonpartisan mission of accurate reporting and telling America’s story, VOA has long enjoyed broad bipartisan support. Just last month, eight former VOA directors from both parties jointly wrote to a group of senior Senators to explain VOA’s role as “one of the most cost-effective instruments of American soft power.” The signatories included Robert Reilly, VOA Director during both the George W. Bush Administration and President Trump’s first Administration, and Danforth Austin, who also led VOA during George W. Bush’s presidency. The signatories cautioned:

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<sup>57</sup> Matthew Kupfer, Over a year after Wagner Group leader’s death, Russian mercenaries aren’t going away, VOA (Nov. 29, 2024), <https://www.voanews.com/a/over-a-year-after-wagner-group-leader-s-death-russian-mercenaries-aren-t-going-away/7881045.html>.

<sup>58</sup> Alex Gendler, Wagner Group Leaves Trail of Destruction from Africa to Russia, VOA (Jul. 18, 2023), <https://www.voanews.com/a/wagner-group-leaves-trail-of-destruction-from-africa-to-russia/7186294.html>.

<sup>59</sup> *Id.*

<sup>60</sup> *Id.*

Gutting VOA would cede an entire continent to America's adversaries and allow authoritarian regimes to control the narrative. VOA operates with extraordinary efficiency in Africa: just 200 staff produce 59 radio shows and 31 TV programs, in addition to managing 16 websites and dozens of social media accounts in 16 languages.

In sum, they explained, "VOA's mission is critical to the United States' interests, and VOA's personnel are hard-working professionals who put themselves at risk for their work."

Legislators from both parties have relied on and responded to VOA's reporting. For example, commenting on VOA's report that Google's Gemini tool could be used to amplify Chinese propaganda, Senator Mark Warner (D-VA), then chairman of the Senate Intelligence Committee, told VOA he is worried about Beijing using AI for disinformation, "whether that's by poisoning training data used by Western firms, coercing major technology companies, or utilizing AI systems in service of covert influence campaigns."<sup>61</sup> Likewise, then-Senator Marco Rubio expressed concern that "AI tools that uncritically repeat Beijing's talking points are doing the bidding of the Chinese Communist Party."<sup>62</sup> Senator Jeanne Shaheen (D-NH), Ranking Member of the Senate Foreign Relations Committee, has also commented on VOA's role in countering AI-created disinformation, arguing that "[a]s we head into an era in which AI could radically alter information warfare, Republicans and Democrats need to join together to restore and strengthen networks like VOA."<sup>63</sup>

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<sup>61</sup> Wenhao Ma, Google AI Gemini parrots China's propaganda, VOA (Jun. 13, 2024), <https://www.voanews.com/a/google-ai-gemini-parrots-china-s-propaganda/7654874.html>.

<sup>62</sup> *Id.*

<sup>63</sup> Jeanne Shaheen, We Need the Voice of America Now More Than Ever, Foreign Policy (Mar. 26, 2025), [https://foreignpolicy.com/2025/03/26/trump-voa-rfa-cuts-truth-russia-propaganda/?utm\\_content=gifting&tpcc=gifting\\_article&gifting\\_article=dHJ1bXAtdm9hLXJmYS1jdXRzLXRydXRoLXJ1c3NpYS1wcm9wYWdhbmRh&pid=OC22371069](https://foreignpolicy.com/2025/03/26/trump-voa-rfa-cuts-truth-russia-propaganda/?utm_content=gifting&tpcc=gifting_article&gifting_article=dHJ1bXAtdm9hLXJmYS1jdXRzLXRydXRoLXJ1c3NpYS1wcm9wYWdhbmRh&pid=OC22371069).

#### **IV. Declarations from Dissidents Show the Power of VOA's Work Bolstering the Position of the United States Around the World**

There is perhaps no more powerful evidence of VOA's contributions to America's global influence and to America's greatest cause—the cause of freedom—than testimonies about VOA's impact from individuals who have suffered for their devotion to that cause. Attached to this brief are sworn declarations from six outstanding individuals who were punished under despotic governments because of their commitment to freedom. They explain how the declarants depended on VOA not only for accurate information but also for inspiration that the United States, the leader of the free world, stood with them.

Gao Yu, now 81, is a courageous independent Chinese journalist who has been imprisoned three times by the regime in Beijing for exposing its brutalities. She has been relying on VOA for more than four decades. As she explains in her declaration, “generations of Chinese citizens have risked their lives to listen to VOA just to access truthful information.” Given the Chinese government's extraordinary censorship and propaganda efforts, “shutting down VOA—a highly influential U.S. government media outlet that the CCP regime fears—is,” in her view, “akin to cutting off one of America's own arms or slitting its own throat. It is ceding the information battlefield to the authoritarian regime, causing pain for the Chinese people and joy for the [Chinese Communist Party] CCP.”

Tennis legend Martina Navratilova grew up listening to VOA behind the Iron Curtain in Communist Czechoslovakia. She explains that in the 1960s and early 1970s, before her defection to the United States, “[VOA] broke through [the] wall of oppression and hopelessness for us. As hard as the regime tried, it could not censor or block VOA's transmissions that came crackling through our radio. Those broadcasts were like oxygen to us.” Looking back, she explains, “[VOA] showed me the kind of life that was possible if you were free to express

yourself, use your mind and imagination, your talents and skills, and pursue your dreams. It gave me and so many others hope that one day we, too, might have those possibilities. And it gave us the will and the courage to fight for that chance. I can't imagine what my life would have become without those hopes and dreams, without that VOA lifeline.”

Former Somali Minister of Foreign Affairs and International Cooperation Mohamed Abdirizak states that “VOA serves as a trusted news source for countless individuals in Somalia and the [Horn of Africa], where misinformation exacerbates conflict. Its reporting provides a critical counterbalance to unreliable narratives.”

Vladimir Kara-Murza, a Russian democracy activist and Pulitzer Prize-winning journalist who spent more than two years in a Siberian prison colony for speaking out against the Putin regime and its full-scale invasion of Ukraine, was just released last year in a prisoner exchange. Like Felix Maradiaga, Kara-Murza first listened to VOA as a child in the company of older members of his family. In those days, “VOA was like a breath of fresh air and in a totalitarian regime like the Soviet Union these broadcasts were the only way people in Russia and other nations behind the Iron Curtain could actually find out truthful information about their own countries and about the world at large.” Since the rise of the Putin regime, he notes, “many, many people inside Russia either listen to these programs or watch them or read them, and the programs have a big reach and a big impact, one that is frankly irreplaceable.”

Afsoon Hajafi, the Iranian woman mentioned above, whose 22-year-old sister Hadis was murdered by the police during a peaceful protest in 2022, describes VOA as “a crucial source of information for us Iranians, allowing us to see and hear about issues that were either censored or entirely ignored by state-controlled media under the Islamic Republic’s laws.” From her personal experience, she reports that “[t]he Islamic Republic is vehemently opposed to [VOA]

and has done everything in its power to block access to it.” It is thus “more important than ever to support independent, uncensored, and truthful media like [VOA]. Without it, many voices, cries for justice, and reports of atrocities would be silenced.”

Finally, Nicaraguan-American democracy campaigner Damris Rostran explains that in the “context of darkness and fear” created by the Sandinista dictatorship, VOA “remains an essential lifeline—reminding us that the world is watching, and that the voice of truth will not be silenced.”

### CONCLUSION

For the foregoing reasons, Amici urge the Court to grant Plaintiffs’ motion for a preliminary injunction.

Respectfully submitted,

\_\_\_\_\_/s/ Jonathan G. Cedarbaum\_\_\_\_

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## APPENDIX A

### LIST OF AMICI

**Elliott Abrams** is a senior fellow for Middle Eastern studies at the Council on Foreign Relations. He served as Special Representative for Iran and Venezuela in the first Trump Administration. In the George W. Bush Administration, Mr. Abrams oversaw U.S. policy in the Middle East as Deputy Assistant to the President and Deputy National Security Advisor.

**Ilan Berman** is Senior Vice President of the American Foreign Policy Council in Washington, DC. An expert on regional security in the Middle East, Central Asia, and the Russian Federation, he has consulted for the U.S. Central Intelligence Agency as well as the U.S. Departments of State and Defense, and provided assistance on foreign policy and national security issues to a range of governmental agencies and congressional offices. He has been called one of America's "leading experts on the Middle East and Iran" by CNN.

**Admiral Dennis Blair** is the Knott Distinguished Visiting Professor of the Practice at the University of North Carolina Chapel Hill. In 2009-2010 he served as the Director of National Intelligence. Admiral Blair's 34-year career in the Navy culminated in his service as Commander of U.S. Pacific Command.

**Johnnie Carson** is a former Foreign Service officer. He served as Assistant Secretary of State for African Affairs, 2009 to 2013, and has held ambassadorial posts in Kenya, 1999 to 2003; Zimbabwe, 1995 to 1997; and Uganda, 1991 to 1994. He served on the National Intelligence Council (NIC) from 2006 to 2009.

**Lisa Curtis** is a foreign policy and national security expert with over 20 years of U.S. government service at the CIA, State Department, National Security Council, and Senate. From 2006 to 2017, Ms. Curtis was senior fellow on South Asia at the Heritage Foundation. During the first Trump Administration, Ms. Curtis served as deputy assistant to the President and National Security Council senior director for South and Central Asia.

**Richard J. Danzig** is chairman of the board of directors of the Center for a New American Security. Between 1977 and 1981, Mr. Danzig served as a Deputy Assistant Secretary of Defense and then as Principal Deputy Assistant Secretary for Manpower, Reserve Affairs, and Logistics. During the Clinton Administration he served as Secretary of the Navy.

**Eric S. Edelman** is Counselor at the Center for Strategic and Budgetary Assessments. He retired as a career minister from the U.S. Foreign Service on May 1, 2009, having served, among many other positions, as U.S. ambassador to Turkey and Finland and as Undersecretary of Defense for Policy. From 2001 to 2003 he served as Vice President Dick Cheney's principal deputy assistant for national security affairs.

**Nancy Ely-Raphel** was the U.S. ambassador to Slovenia from 1998 to 2001. From 2001 to 2003, she was the first director of the State's Department's Office to Monitor and Combat Trafficking in Persons.

**Carl Gershman** was the founding president of the National Endowment for Democracy. During President Reagan's first term he served as Senior Counselor to Ambassador Jeane Kirkpatrick and as the U.S. representative in the Third Committee of the UN General Assembly that deals with human rights.

**Frank Kendall** is a 1971 graduate of West Point and a retired Lieutenant Colonel in the Army Reserve. From 2011 to 2017, he served as the Undersecretary of Defense for Acquisition, Technology, and Logistics. In 2021-2025, he served as Secretary of the Air Force.

**Deborah A. McCarthy** is a nonresident senior fellow at the Atlantic Council's Scowcroft Center for Strategy and Security. She served U.S. ambassador to Lithuania from 2013 to 2016. She also served as deputy ambassador to Greece and Nicaragua and as principal deputy assistant secretary of state for economic and business affairs, deputy assistant secretary for narcotics and law enforcement, senior advisor for counterterrorism, and special coordinator for Venezuela.

**John Negroponte** is the former J.B. and Maurice C. Shapiro Professor of International Affairs at George Washington University's Elliott School of International Affairs. He served as the first Director of National Intelligence from 2005 to 2007, and as U.S. Ambassador to Iraq in 2004-2005, both during the George W. Bush Administration. During the Bush Administration Mr. Negroponte also served as U.S. Ambassador to the United Nations. From 1960 to 1997, he served in the U.S. Foreign Service, including as U.S. Ambassador to Honduras, Mexico, and the Philippines.

**Thomas R. Pickering** is a retired American diplomat. From 1997 to 2000, he served as Undersecretary of State for Political Affairs. Prior to that, over his four-decade career in the Foreign Service, he served as U.S. Ambassador to Russia, India, the United Nations, Israel, El Salvador, Nigeria, and Jordan.

**William Howard Taft IV** served as Legal Adviser to the Department of State during the George W. Bush Administration, from 2001 to 2005. Earlier in his career, he served as U.S. Permanent Representative to NATO from 1989 to 1992; as Acting Secretary of Defense from January to March 1989; as Deputy Secretary of Defense from 1984 to 1989; and as general counsel of the Department of Defense from 1981 to 1984.

**General Joe Votel** is a retired U.S. Army four-star officer and the former president and CEO of Business Executives for National Security. He served as Commander of U.S. Central Command from 2016 to 2019. In that capacity, he was responsible for U.S. and coalition military operations in the Middle East, the Eastern Mediterranean, and Central and South Asia.

**APPENDIX B**

**DECLARATIONS**

1. GAO YU
2. MARTINA NAVRATILOVA
3. MOHAMED ABDIRIZAK
4. VLADIMIR KARA-MURZA
5. AFSOON NAJAFI
6. DAMARIS ROSTRAN