

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MIDDLE EAST BROADCASTING
NETWORKS, INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA;
UNITED STATES AGENCY FOR GLOBAL
MEDIA; 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 Chief Executive Officer of the
United States Agency for Global Media;
OFFICE OF MANAGEMENT AND
BUDGET; RUSSELL VOUGHT, in his official
capacity as Director of United States Office of
Management and Budget; UNITED STATES
DEPARTMENT OF TREASURY; and SCOTT
BESSENT, in his official capacity as United
States Secretary of the Treasury,

Defendants.

Case No. 1:25-cv-00966-RCL

**BRIEF OF PROPOSED AMICI CURIAE THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS AND COMMITTEE TO PROTECT JOURNALISTS IN
SUPPORT OF PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

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INTEREST OF AMICI CURIAE

Amici curiae are the Reporters Committee for Freedom of the Press (the “Reporters Committee”) and the Committee to Protect Journalists (“CPJ”) (together, “amici”).¹ The Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to defending the First Amendment and newsgathering rights of the news media. Founded by journalists and media lawyers in 1970, when the nation’s press faced an unprecedented wave of government subpoenas forcing reporters to name confidential sources, today its attorneys provide *pro bono* legal representation, amicus curiae support, and other legal resources to protect journalists.

The Committee to Protect Journalists is an independent, nonprofit organization that was founded in 1981 to promote press freedom worldwide. It defends the right of journalists to report the news without fear of reprisal. CPJ is a global organization headquartered in New York City. CPJ’s board of directors is composed of prominent journalists, media executives, and leaders from related professions.

As organizations committed to defending First Amendment freedoms, such as the right to gather and report the news, amici have a powerful interest in ensuring that the constitutional rights of all journalists, including working journalists at the U.S.

Agency for Global Media networks, are not infringed, *see, e.g., Reporters Committee*

¹ No party or party counsel authored this amici brief in whole or in part, or made a monetary contribution intended to fund its preparation or submission. No person other than amici made a monetary contribution to the preparation or submission of this brief.

Letter: Congress Must Protect Voice of America's Editorial Independence, Reps. Comm. for Freedom of the Press (Apr. 28, 2020), <https://perma.cc/34QC-8G5D>, and that the U.S. Agency for Global Media ("USAGM") complies with Congress's instruction to "respect[] the professional integrity and editorial independence" of the networks, 22 U.S.C. § 6205(d)(6)(a).

Amici respectfully submit this amici curiae brief pursuant to Local Civil Rule 7(o).

INTRODUCTION

For decades, Middle East Broadcasting Networks, Inc. (“MBN”) and its sister networks funded by the U.S. Agency for Global Media (“USAGM”) have been vital sources of news and information for hundreds of millions of people around the world—in some countries, the only viable alternative to state-controlled media. Through their work producing credible, independent journalism, these networks and their reporters “export[] the cardinal American values of free speech, freedom of the press, and open debate to the dark corners of the world where independent, objective coverage of current events is otherwise unavailable.” *Turner v. U.S. Agency for Glob. Media*, 502 F. Supp. 3d 333, 341–42 (D.D.C. 2020). And to fulfill that purpose, Congress recognized, MBN and its sister networks must enjoy “professional integrity and editorial independence.” 22 U.S.C. § 6205(d)(6)(a). In other words, they must be—and must be seen by their audience as—“independent broadcasters,” not just “house organs for the United States Government.” *Ralis v. RFE/RL, Inc.*, 770 F.2d 1121, 1125 (D.C. Cir. 1985).

Lawmakers therefore created a detailed statutory scheme that ensures the networks can operate with the autonomy necessary to secure the audience’s trust, producing news free from political tampering “which is consistently reliable and authoritative, accurate, objective, and comprehensive.” 22 U.S.C. § 6202(b)(1). Those values, enshrined in law, are vital to the work, and safety, of USAGM journalists around the world. But with the stroke of a pen, the Administration has moved to

eliminate USAGM, *see* Exec. Order No. 14,238, 90 Fed. Reg. 13043 (Mar. 14, 2025), available at <https://perma.cc/F9SY-ZDEE>, and refused to disburse congressionally appropriated funds for MBN. It did so, the President’s senior advisers suggested, on the baseless view that USAGM network journalism is the work of “radical left crazy people,” *e.g.*, Elon Musk (@elonmusk), X (Feb. 9, 2025, 8:02 AM), <https://perma.cc/L3GE-ZWXJ>, and that other USAGM networks produce “radical propaganda,” *The Voice of Radical America*, The White House (March 15, 2025), <https://perma.cc/8L6A-P9CS>. That attack on Congress’s design and MBN’s journalism not only threatens to shutter MBN today; if upheld, it would severely undermine the USAGM networks’ credibility going forward.

Just as it would be for any other news organization, MBN’s “credibility is central to the[] ultimate product and to the conduct of the enterprise.” *Newspaper Guild of Greater Phila., Local 10 v. NLRB*, 636 F.2d 550, 560 (D.C. Cir. 1980). If the USAGM networks were perceived to be subject to the whims of any given presidential administration—because any disagreement with the content of their reporting could lead the Executive Branch to withhold funding, leaving them too decimated to operate—no audience will trust the broadcasters to produce “consistently reliable and authoritative” news rather than propaganda. 22 U.S.C. § 6202(a)(5). That concern is particularly grave here, where MBN’s journalists report on countries where their safety may be at risk if they are perceived to be agents of the government. If not blocked here

and now, the funding rescission will cause irreversible damage to MBN's reputation and its ability to serve its central purpose, even if Congress or a future Administration attempts to revive its vital work.

A temporary restraining order and preliminary injunction should issue. The Administration lacks authority to discard Congress's "manifest" intent—consistently expressed over the course of five decades—that MBN and its sister networks "enjoy independence in programming and broadcasting decisions." *Ralis*, 770 F.2d at 1125. For the reasons set forth herein, amici urge the Court to grant Plaintiff's request for immediate emergency relief to safeguard the independence of USAGM networks and to protect the safety of their dedicated journalists, who work to bring the world the news.

ARGUMENT

I. The editorial independence of USAGM networks is essential to their credibility, their mission, and the safety of their reporters.

For the better part of a century, Congress has supported USAGM networks to ensure *bona fide* reporting and "freedom of opinion and expression" can reach countries that do not have a free press. International Broadcasting Act, Pub. L. No. 93-129, 87 Stat. 456, 457–58 (1973); *see also* Emergency Wartime Supplemental Appropriations Act, Pub. L. No. 108-11, 117 Stat. 559, 562 (2003) (legislating funding "for activities related to the Middle East Television Network broadcasting to the Middle East and radio broadcasting to Iraq"). And from the outset, publicly funded broadcasting overseas has staked its claim to that audience's trust on credibility and autonomy. As Voice of

America's first transmission in 1942 announced to the world, "The news may be good or bad; we shall tell you the truth." See Voice of Am., *VOA's First Broadcasts: "The News May Be Good or Bad; We Shall Tell You the Truth"*, YouTube (Mar. 8, 2012), <https://tinyurl.com/y2ccoc28>; see also Middle East Broad. Networks, *Journalistic Code of Ethics 2* (Sept. 2023), <https://perma.cc/VN2Z-4CNR> (emphasizing that "MBN is independent from all political parties, ruling or opposition groups or organizations, émigré organizations, commercial or other special-interest organizations, and religious bodies" and does not "endorse or advocate any specific . . . viewpoint").

In periods of turbulence and change, MBN and its sister networks have consistently provided access for all people, including those living under repressive regimes, to accurate media. See Middle East Broad. Networks, *Fast Facts 2* (2024), <https://perma.cc/R2BD-YLDR>. And they have won the trust of audiences "in countries where media are controlled by governments that lie about the world." Editorial Board, *A U.S. Retreat in the War of Ideas*, Wall St. J. (Mar. 19, 2025), <https://bit.ly/4iJxUp1>. MBN was formed amid the Iraq War and tumult in the Middle East in order to "provide objective, accurate, and relevant news and information through television, radio, and the internet to 22 Arabic-speaking nations." U.S. Dept. of State Office of Inspector General, *Inspection of the Broadcasting Board of Governors' Middle East Broadcasting Networks 1* (Feb. 2017). Today, MBN publishes on vital issues from war and religion to terrorism and corruption in some of the countries with the worst press-freedom records

in the world. *See* Fast Facts, *supra*, at 2. In 2024, with the funding the Administration has moved to freeze—which accounts for a majority of the organization’s funding—MBN reported reaching 34.1 million listeners. *Id.* at 1.

Throughout that history, bipartisan majorities in Congress have recognized that independent, professional broadcasters like MBN would advance “[t]he long-range interests” of the United States—not instead of reporting the news, but *by* reporting the news. *See* Foreign Relations Authorization Act, Fiscal Year 1977, Pub. L. No. 94-350, § 503, 90 Stat. 823, 831 (1976). Congress has therefore expressly rejected opportunities “to transform [USAGM networks] from independent broadcasters into house organs for the United States Government,” which it saw “as inimical to the fundamental mission of those stations.” *Ralis*, 770 F.2d at 1125 (citing H.R. Rep. No. 510, 93d Cong., 1st Sess. 3–5 (1973), *reprinted in* 1973 U.S. Code Cong. & Ad. News 2271, 2272–74).

For good reason. MBN and its sister networks can accomplish Congress’s goals only if they maintain meaningful independence—both actual independence and the perception of it—from political control. *See Ralis*, 770 F.2d at 1125. MBN and its sister “outlets are not intended to promote uncritically the political views and aspirations of a single U.S. official, even if that official is the U.S. President.” *Turner*, 502 F. Supp. 3d at 342 (recognizing the First Amendment rights of journalists at Voice of America and rejecting effort to subvert statutory “firewall” protecting them). Listeners turn to these stations as an alternative to state media, not as their second state-media option. *See, e.g.,*

U.S. Agency for Global Media, Audience and Impact: Overview for 2019, at 17 (2019) (finding that videos fact-checking local disinformation are among VOA and RFE/RL's most popular offerings in Russia). Editorial independence for these newsrooms is "central to [the] success of this critical foreign policy" embodied in the USAGM statute. *Turner*, 502 F.Supp. 3d at 342.

The framework carefully crafted by Congress reflects that commitment.² In 1994, when Congress acted to consolidate non-military broadcasting into USAGM, it also established firm guardrails protecting the networks' autonomy—including the requirement that agency leadership "respect the[ir] professional independence and integrity." United States International Broadcasting Act of 1994, Pub. L. No. 103-236, § 305, 108 Stat. 382, 436 (1994). Congress retained that requirement when it reorganized the networks in 1998, *see* Omnibus Consolidated and Emergency Supplemental Appropriations Act, Pub. L. No. 105-277, § 1323, 112 Stat. 2681, 2681–780, again when it reorganized them further in 2016, *see* National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, § 1288, 130 Stat. 2000, 2548, and again in 2021 when it revised the structure in response to attacks on Voice of America's independence, *see* National Defense Authorization Act for Fiscal Year 2021, Pub. L. No. 116-183, 134 Stat. 3388, 4023. Those guarantees make possible Congress's goal of ensuring that the

² The First Amendment likewise underpins it. *See Turner*, 502 F. Supp. 3d at 376.

audience can trust the networks' journalism will be "reliable and authoritative, accurate, objective, and comprehensive" —not politically motivated. *Id.* § 6202(b)(1).

Today, USGAM networks' independence and commitment to high-quality journalism remains their core value, helping them attract a massive audience. The networks collectively report a staggering 427 million viewers and listeners across all media. *See* U.S. Agency for Global Media, Audience and Impact: Overview for 2025, at 1 (2025), <https://perma.cc/KLY4-HYMX>. And that audience trusts the networks to provide them with factual information about global politics, economic developments, and other subjects. Eighty-three percent of MBN's weekly audience finds the stations to be trustworthy; 69 percent of listeners said they rely on MBN to help them form opinions on important issues. *Id.* at 2. The networks could not have achieved that degree of success had they operated as, or been seen as, a Ministry of Truth that could be redirected or dismantled with a single stroke by any given president.

Nor could USAGM reporters do their work safely under those circumstances. In fulfilling their role, these journalists often report on events in hostile foreign countries, where they risk retaliation and threats to their physical safety. *See, e.g.,* Jason Rezaian, *These 10 Jailed Journalists Worked for U.S. Outlets that Trump Silenced*, Wash. Post (Mar. 20, 2025), <https://bit.ly/4j6N1Z9>. Some of them are freelancers who still live in those nations, and the sudden elimination of their funding has left them without security and in immediate danger of physical harm. Other journalists have fled their native

countries and continue to report on events there from the United States, but now — without jobs — they risk the loss of legal status and removal to a country run by a hostile government that resents their coverage.

The dangers are very far from hypothetical. As amicus Committee to Protect Journalists has documented, at least four journalists and media workers with MBN's outlets have been killed in connection with their work. That includes Abdul-Hussein Khazal, a correspondent for the U.S.-funded television station Al-Hurra who was shot dead in Basra in 2005 together with his 3-year old son, *see Gunmen Kill Reporter, Young Son in Basra*, Comm. to Protect Journalists (Feb. 9, 2005), <https://perma.cc/TR47-NF3A>; Tahrir Kadhim Jawad, a cameraman for Al-Hurra who was killed by a bomb attached to his car while on assignment in 2010, *see Tahrir Kadhim Jawad*, Comm. to Protect Journalists (Oct. 4, 2010), <https://perma.cc/8QTF-SGHG>; and Bashar Fahmi Kadumi, another journalist for Al-Hurra, who has been missing since 2012, *Bashar Fahmi*, Comm. to Protect Journalists (Aug. 20, 2012), <https://perma.cc/ZA62-BKGI>. Iraqi authorities, too, have repeatedly curtailed MBN outlets, ordering the shuttering of Al-Hurra for six months in 2019 after the station aired a report on alleged state corruption that authorities claimed was not “professional.” *Iraq Suspends U.S.-Funded Broadcaster Al-Hurrah over Corruption Report*, Comm. to Protect Journalists (Sept. 3, 2019), <https://perma.cc/G8CH-NAFW>. Each attack on the independence of the networks not

only threatens their ability to serve their fundamental mission, then—it endangers the lives and liberty of the reporters dedicated to bringing that news to the world.

II. Allowing the Executive to withhold USAGM networks’ funding unilaterally would destroy the independence that makes them effective.

By executive order, the President has moved to dismantle USAGM and freeze funding to MBN and its sister networks, overturning Congress’s “manifest” intent that the networks “enjoy independence in programming and broadcasting decisions.” *Ralis*, 770 F.2d at 1125. If the gambit succeeds, the damage to the project of federally funded broadcasting overseas will be irreparable. Even if a future Administration or a future Congress were to restore the impounded funds, the knowledge that a threat like this one hangs over the networks’ heads—a Sword of Damocles waiting to fall if their coverage angers the President—would leave a lasting tarnish on their credibility.

That unilateral funding freeze is unlawful. “[I]f [Congress’s] authority to make law and control spending is to mean anything, it means the President may not disregard a statutory mandate to spend funds ‘simply because of policy objections.’” *Aids Vaccine Advoc. Coal. v. United States Dep’t of State*, Nos. 25-00400 & 25-00402, 2025 WL 752378, at *15 (D.D.C. Mar. 10, 2025) (quoting *In re Aiken County*, 725 F.3d 255, 259 (D.C. Cir. 2013)); see also *City & County of San Francisco v. Trump*, 897 F.3d 1225 (9th Cir. 2018) (“[T]he Administration may not redistribute or withhold properly appropriated funds in order to effectuate its own policy goals.”). And that fundamental separation-of-powers principle has special importance here, where tolerating this degree of

presidential control would make a nullity of Congress' stated goal of maintaining MBN as an independent network rather than politicized "house organs for the United States Government." *Ralis*, 770 F.2d at 1125. Congress has, through clear and consistent statutory language, insisted that USAGM networks remain outlets for independent journalism that is not dictated by the government. Because of the freedom Congress has codified, USAGM networks have earned trust and built reputations that have allowed their journalists to gather and disseminate news to audiences without other access to independent sources of news. But if any President has the power to effectively shutter MBN at any time, the foundation for that reliability disappears—unlikely to return.

The harm is only underscored by the reality that the Administration has justified defunding USAGM and MBN by pointing to editorial disagreements with the networks' content. The Executive Branch has not been shy about its disdain for certain reporting done by Voice of America. *See The Voice of Radical America*, The White House (March 15, 2025), <https://perma.cc/8L6A-P9CS> (explaining that the Executive Order was a response to what the President perceived as "radical propaganda" produced by VOA); *Senior Advisor Kari Lake Cancels Obscenely Expensive 15-Year-Lease That Burdened The Taxpayers And Enforces Trump's Executive Order To Drastically Downsize Agency*, USAGM (March 15, 2025), <https://perma.cc/T95P-2ZLA> (criticizing work product that purportedly "parrots the talking-points of America's adversaries"); Kari Lake

(@KariLake), X (March 19, 2025, 7:21 PM), <https://perma.cc/LMM9-LHRR>. (taking issue with VOA’s purportedly “anti-American content”). Likewise, senior adviser to the President Elon Musk insisted that USAGM networks are “just radical left crazy people talking to themselves.” *Musk Calls for Closure of US State Media*, RT (Feb. 9, 2025), <https://perma.cc/VB26-9PG8> (reporting that “[t]he head of DOGE has said Radio Free Europe and Voice of America are essentially ‘radical left’” and “called for [them] to be shut down”) (citing Mario Nawfal (@MarioNawfal), X (Feb. 9, 2025), <https://x.com/MarioNawfal/status/1888550915784733106>). In any context, that sort of avowed discrimination on the basis of a media organization’s perceived viewpoint is “poison to a free society.” *Iancu v. Brunetti*, 588 U.S. 388, 399 (2019) (Alito, J., concurring). But it causes special damage here, where the USAGM networks’ future listeners, readers, and watchers will predictably assume, with good reason, that the networks can now only distribute information that aligns with the particular policy preferences of whichever president holds office at the time. This will remain so for many administrations to come.

That result contravenes the express will of Congress, and the President lacks any constitutional authority to overturn Congress’s judgment that independent reporting—not political propaganda—best serves the interests of the United States. If not stopped here, the Administration’s unilateral funding freeze will put the entire model of federally funded networks at risk, not just today but well into the future. And it will

risk, too, the safety of reporters who have committed their careers to producing credible journalism under exceptionally challenging and dangerous conditions. This Court should enjoin it.

CONCLUSION

For the foregoing reasons, amici respectfully urge the Court to grant Plaintiff's motion for a temporary restraining order and preliminary injunction.

Dated: April 11, 2025

Respectfully submitted,

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