

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

RHODE ISLAND COALITION AGAINST  
DOMESTIC VIOLENCE, *et al.*

*Plaintiffs,*

v.

ROBERT F. KENNEDY, JR., in his official  
capacity as Secretary of the United States  
Department of Health and Human Services, *et al.*

*Defendants.*

Case No. 1:25-cv-00342

**DEFENDANT HUD'S NOTICE OF COMPLIANCE WITH THE COURT'S  
TEMPORARY RESTRAINING ORDER (corrected)**

The U.S. Department of Housing and Urban Development ("HUD") and HUD Secretary Scott Turner (collectively, "the HUD defendants"), respectfully submit this Notice of Compliance regarding the Court's Temporary Restraining Order ("TRO") entered on July 28, 2025. Among other things, the Court's Order directed that HHS and HHS-affiliated defendants provide notice of the TRO's terms as follows:

By the end of the second day after issuance of this Order, . . . HUD's counsel shall provide written notice of this Order to all of its employees[.]

By the end of the second day after issuance of this Order, the [HUD] Defendants shall file on the Court's electronic docket a Status Report documenting the actions that they have taken to comply with this Order, including a copy of the notice and an explanation as to whom the notice was sent.

ECF No. 23, at ¶¶6-7.

Consistent with the Court's Order, on July 28, 2025, the undersigned counsel provided written notice of the Order to HUD's agency counsel and confirmed that the agency should

disseminate the Order to all HUD employees and contractors in accordance with the terms of the Order.

On July 30, 2025, at the direction of HUD's Office of General Counsel, HUD's Office of Public Affairs sent a copy of the Court's Order along with written Notice concerning the Court's Order to all HUD agency employee and contractors, via email. A copy of the transmittal email and Notice of Order are attached together here as Exhibit A.

Dated: July 30, 2025

Respectfully submitted,

U.S. DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT;  
SCOTT TURNER, in his official  
capacity as Secretary of Housing and  
Urban Development,

By their Attorneys,

SARA MIRON BLOOM  
Acting United States Attorney

/s/ Lauren S. Zurier

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**Certification of Service**

On this 30th day of July, 2025, I caused the within document to be filed electronically. It is available for viewing and downloading from the Court's ECF system, which will serve it upon all counsel of record.

/s/ Lauren S. Zurier

LAUREN S. ZURIER

Assistant United States Attorney



**From:** Office of Public Affairs <OfficeofPublicAffairs@hud.gov>  
**Sent:** Wednesday, July 30, 2025 4:51 PM  
**To:** Office of Public Affairs  
**Subject:** Notice of Court Order in the case of: Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al., 1:25-cv-342 (D.R.I.)  
**Attachments:** RICADV v. Kennedy - TRO Order 7.28.2025.pdf; RICADV v. Kennedy - Notice of TRO 7.30.2025.pdf



HUD Staff and Contractors,

At the direction of the United States District Court for the District of Rhode Island, you are hereby advised that a temporary restraining order has been entered in the case of *Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al.*, 1:25-cv-342 (D.R.I.), ECF No. 23 (July 28, 2025). The Court has directed that notice of the order shall be provided to “all [HUD] employees” by “the second day after [its] issuance.”

A copy of the order and notice prepared by HUD’s Office of General Counsel regarding the Court’s order is attached for reference.

To: All Agency Employees and Contractors  
U.S. Department of Housing and Urban Development

From: Associate General Counsel for Litigation  
Office of General Counsel  
U.S. Department of Housing and Urban Development

Date: July 30, 2025

Re: Notice of Court Order in the case of: *Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al.*, 1:25-cv-342 (D.R.I.)

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### NOTICE OF COURT ORDER

On July 28, 2025, the United States District Court for the District of Rhode Island entered a temporary restraining order (“Order”) in *Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al.*, 1:25-cv-342 (D.R.I.), ECF No. 23. The Order directed, “By the second day after issuance of this Order, HUD’s counsel shall provide written notice of this Order to all of its employees.” A copy of the Order is attached for reference.

As relevant to you, this case challenges certain terms incorporated into U.S. Department of Housing and Urban Development (“HUD”) Continuum of Care (“CoC”) grant agreements for Fiscal Years 2024, 2025, and 2026. The relevant terms at issue (the “CoC Grant Conditions”) are as follows:

1. The recipient “shall not use grant funds to promote ‘gender ideology,’ as defined in E.O. 14168 Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government”;
2. The recipient “agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government’s payment decisions for purposes of [the False Claims Act, 31 U.S.C. § 3729(b)(4)]”;
3. The recipient “does not use any Grant Funds to fund or promote elective abortions, as required by E.O. 14182, Enforcing the Hyde Amendment”; and
4. The recipient’s “use of funds provided under this Agreement . . . , and the Recipient’s operation of projects assisted with Grant Funds are governed by . . . [a]ll current Executive Orders.”

The Plaintiffs whom the Order applies to are the following: Pennsylvania Coalition Against Domestic Violence, House of Hope Community Development Corporation, Rhode Island Coalition to End Homelessness, Virginia Sexual and Domestic Violence Action Alliance, and these Plaintiffs’ members (collectively the “HUD TRO Plaintiffs”).

The Order immediately prohibits HUD—including its employees, contractors, and “any person in active concert or participation” with HUD—from requiring the HUD TRO Plaintiffs to agree

to the CoC Grant Conditions or substantially similar conditions as a requirement for receiving funding under a CoC grant; and from otherwise enforcing these or substantially similar conditions against the HUD TRO Plaintiffs with respect to a CoC grant;

1. Further, HUD:
  - a) shall immediately treat any actions taken to implement or enforce the CoC Grant Conditions or any materially similar terms or conditions, as to the HUD TRO Plaintiffs' CoC grants, including any delays or withholding of funds based on such conditions, as null, void, and rescinded;
  - b) shall immediately treat as null and void any such conditions included in any agreement pertaining to a HUD CoC grant executed by any HUD TRO Plaintiff, while this Order is in effect; and
2. HUD shall immediately take every step necessary to effectuate this Order, including clearing any administrative, operational, or technical hurdles to implementation.

Although the Order reflects that it expires on August 11, 2025 at 5 p.m., please be advised that litigation in the case is ongoing, and the Order must be complied with until further notice. Please review the Order.

If you have any questions about the scope or effect of the Order, please contact HUD's Office of General Counsel. Thank you for your attention to this matter.