

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLANDRHODE 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

**THE HUD DEFENDANTS' NOTICE OF COMPLIANCE WITH THE COURT'S
REVISED TEMPORARY RESTRAINING ORDERS**

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 two revised Temporary Restraining Orders (“TRO”), both of which were entered on August 7, 2025, as ECF Nos. 34 and 37, respectively. Pursuant to further clarification provided by the Court on Friday August 8, 2025, the HUD defendants provided notice of both revised TROs in accordance with the terms of the second revision of the TRO entered as ECF No. 37 (the “Second Revised TRO”). The Second Revised TRO directed that the HUD defendants provide notice of each TRO’s terms as follows:

By the end of the second business 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 business 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. 37, at ¶¶6-7.

Consistent with the Court's Second Revised Order, on August 7 and again on August 8, 2025, the undersigned counsel provided written notice of both revised TROs (ECF Nos. 34 and 37) to HUD's agency counsel and confirmed that the agency should disseminate both TROs to all HUD employees and contractors in accordance with the terms of the Second Revised Order.

On August 11, 2025, at the direction of HUD's Office of General Counsel, HUD's Office of Public Affairs sent copies of both revised TROs (ECF Nos. 34 and 37) along with written Notice concerning both of the Court's Orders to all HUD agency employee and contractors, via email. A copy of the transmittal email and Notice of Orders are attached together here as Exhibit A.

Dated: August 11, 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

LAUREN S. ZURIER

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Certification of Service

On this 11th day of August, 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: Monday, August 11, 2025 3:31 PM
To: Office of Public Affairs
Subject: Court Notice of Revised Orders: Rhode Island Coalition Against Domestic Violence v. Kennedy, 1:25-cv-342 (D.R.I.)
Attachments: RICADV v. Kennedy - Notice of Revised TROs 2025.08.08.pdf; ECF No. 34 Revised TRO 2025.08.07 - RICADV v. Kennedy.pdf; ECF No. 37 Second Revised TRO 2025.08.07 - RICADV v. Kennedy.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 previously entered temporary restraining order has been expanded 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. 34 (August 7, 2025) and ECF No. 37 (August 7, 2025). The Second Revised Order (ECF No. 37) is the operative order now. The Court has directed that notice of these revised orders shall be provided to “all [HUD] employees” by “the end of the second business day after [its] issuance.”

A copy of the revised orders and notice prepared by HUD’s Office of General Counsel regarding them 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 the General Counsel
U.S. Department of Housing and Urban Development

Date: August 8, 2025

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

NOTICE OF REVISED TEMPORARY RESTRAINING ORDERS

On August 7, 2025, the United States District Court for the District of Rhode Island in *Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al.*, 1:25-cv-342 (D.R.I.), entered two orders that revised and expanded the original temporary restraining order (TRO) issued on July 28, 2025 (ECF No. 30). Those two orders are the “Revised TRO” (ECF No. 34) and the “Second Revised TRO” (ECF No. 37). A copy of each is attached for reference. The Second Revised TRO includes and incorporates all information contained in the original TRO and the Revised TRO, and expands on each, so the Second Revised TRO is now the operative TRO in this case.

Like the original TRO, the revised TROs direct that HUD “shall provide written notice of this Order to all of its employees” by “the end of the second business day after issuance” of these orders. Accordingly, this Notice is provided.

The Second Revised TRO incorporates parties from the two prior TROs, adds parties whom the temporary restraining order applies to, expands the grant programs covered by the order, and lifts the original TRO’s August 11 expiration date.

As relevant to you, this case challenges certain terms incorporated into HUD’s Continuum of Care (“CoC”) and Community Development Block Grant (“CDBG”) grant agreements for Fiscal Years 2024, 2025, and 2026. The relevant terms at issue (the “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

Exhibit A

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 Second Revised TRO applies to are the following: Community Care Alliance, California Partnership to End Domestic Violence, Montana Coalition Against Domestic and Sexual Violence, 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 Second Revised TRO 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 Grant Conditions or substantially similar conditions as a requirement for receiving funding under a CoC or CDBG grant; and from otherwise enforcing these or substantially similar conditions against the HUD TRO Plaintiffs with respect to a CoC or CDBG grant;

1. Further, HUD:
 - a) shall immediately treat any actions taken to implement or enforce the Grant Conditions or any materially similar terms or conditions, as to the HUD TRO Plaintiffs' CoC and CDBG 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 or CDBG 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.

The Second Revised TRO remains in effect until the Court determines otherwise. Please review the TROs.

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