

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

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

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 fourth revised Temporary Restraining Order (“Fourth Revised TRO”), which was entered on September 16, 2025, as ECF No. 64. The Fourth Revised TRO directed that the HUD defendants provide notice of its 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. 64, at ¶¶6-7.

Consistent with the Court’s Fourth Revised TRO, on September 16, 2025, government counsel provided written notice of the Fourth Revised TRO to HUD’s agency counsel and

confirmed that the agency should disseminate the Fourth Revised TRO to all HUD employees in accordance with the TRO's terms.

On September 17, 2025, at the direction of HUD's Office of General Counsel, HUD's Office of Public Affairs sent copies of the Fourth Revised TRO 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: September 17, 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
Assistant United States Attorney
One Financial Plaza, 17th Floor
Providence, RI 02903
(401) 709-5000
Lauren.Zurier@usdoj.gov

Certification of Service

On this 17th day of September 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/ Bethany N. Wong

BETHANY N. WONG

Assistant United States Attorney



From: Office of Public Affairs <OfficeofPublicAffairs@hud.gov>
Sent: Wednesday, September 17, 2025 2:00 PM
To: Office of Public Affairs
Subject: Notice of Court Order - Rhode Island Coalition Against Domestic Violence, et al. v. Kennedy, et al., 1:25-cv-342 (D.R.I.)
Attachments: 2025.09.17 R.I Coalition - Notice of 4th Rev. TRO ECF 64.pdf; ECF 64 - Fourth Revised Order Granting TRO.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. 64 (September 16, 2025). The Fourth Revised Order (ECF No. 64) is the operative order now. The Court has directed that notice of this revised order shall be provided to “all [HUD] employees” by “the end of the second business day after [its] issuance.”

A copy of the revised order and notice prepared by HUD’s Office of General Counsel regarding it 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: September 17, 2025

Re: Notice of Revised 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.)

NOTICE OF REVISED TEMPORARY RESTRAINING ORDERS

On September 16, 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.) (ECF No. 64), entered an order that revised and expanded the previously amended temporary restraining order (TRO) issued on August 7, 2025 (ECF No. 47). This order is the “Fourth Revised TRO.” A copy is attached for reference.

Like the previous amended TROs, the Fourth Revised TRO directs 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 this order. Accordingly, this Notice is provided.

The Fourth Revised TRO adds parties covered by the temporary restraining order, the Iowa Coalition Against Domestic Violence and the Rhode Island Haus of Codec.

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
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 Fourth Revised TRO applies to are the following: Colorado Coalition Against Sexual Assault, Community Care Alliance, California Partnership to End Domestic Violence, Iowa Coalition Against Domestic Violence, Kansas Coalition Against Sexual and 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, Rhode Island Haus of Codec, Virginia Sexual and Domestic Violence Action Alliance, and these Plaintiffs' members (collectively the "HUD TRO Plaintiffs").

The Fourth 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, or HUD TRO Plaintiff member, 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 Fourth Revised TRO remains in effect until the Court determines otherwise. Please review the TRO.

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