

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

Centro de Trabajadores Unidos, et al.,

Plaintiffs,

v.

Scott Bessent, in his official capacity as
Secretary of the Treasury, et al.,

Defendants.

Civil Action No. 25-677 (DLF)

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs hereby move for a preliminary injunction (1) enjoining Defendants Secretary of the Treasury Scott Bessent, the Internal Revenue Service (IRS), and acting Commissioner of Internal Revenue Melanie Krause (collectively, Treasury Defendants) from disclosing any return information for purposes of immigration enforcement to Defendants U.S. Department of Homeland Security (DHS), Secretary of Homeland Security Kristi Noem, U.S. Immigration and Customs Enforcement (ICE), and acting ICE Director Todd M. Lyons (collectively, DHS Defendants); and (2) enjoining DHS Defendants from inspecting or using for purposes of immigration enforcement any return information obtained from Secretary of the Treasury Scott Bessent, the Internal Revenue Service, and acting Commissioner of Internal Revenue Melanie Krause. Plaintiffs' proposed preliminary injunction would not bar the disclosure of return information expressly authorized by 26 U.S.C. § 6103.

As set forth in more detail in the accompanying memorandum, Treasury Defendants and DHS Defendants are close to finalizing an agreement under which the IRS would disclose taxpayer address information to DHS Defendants in violation of the confidentiality requirements of the

Internal Revenue Code. Plaintiffs will suffer imminent and irreparable injury if such unlawful disclosure and access takes place.

On Friday, March 28, 2025, Plaintiffs approached counsel for the Department of Justice (DOJ) who have entered an appearance in this case, to request that Defendants agree not to share or access taxpayer information until such further time as the parties may agree to or until this Court may consider Plaintiffs' claims. Defendants rejected Plaintiffs' request, necessitating the need for preliminary relief to prevent a disclosure of or access to return information while this litigation is ongoing. Plaintiffs reserve the right to seek emergency relief to prevent such disclosure or access before this Court has decided this motion for a preliminary injunction.

Dated: March 31, 2025

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(Motion for *pro hac vice* forthcoming)
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(Motion for *pro hac vice* forthcoming)
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Respectfully submitted,

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