

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**Solutions in Hometown Connections, et al.,**

Plaintiffs,

v.

**Kristi Noem, et al.,**

Defendants.

**Civil Case No. 8:25-cv-885-LKG**

**PLAINTIFFS' NOTICE OF GRANT TERMINATIONS**

Plaintiffs write to inform the Court that on Thursday, March 27—just two days after Plaintiffs filed their motion for preliminary relief, Dkt. 30—Defendants informed all Plaintiffs that their grants were terminated, effective immediately. *See* Exs. B-J, J.R. 220-46.<sup>1</sup>

The grant termination letters instruct Plaintiffs to stop all work on these grants immediately, and state that “any costs incurred for such work on or after the date of this letter will be unallowable.” *See, e.g.*, Ex. B, J.R. 220. Plaintiffs are in the middle of providing English and citizenship classes to students and have attorney-client relationships with lawful permanent residents who have applied or are planning to apply for U.S. citizenship—work that was all funded by CIGP grants. *See, e.g.*, J.R. 025 (discussing 14-week cycle of citizenship classes), 030 (ethical obligation to continue representing clients in naturalization process), 031 (unable to pay

---

<sup>1</sup> Defendants appear to have terminated all, or nearly all, Citizenship and Integration Grant Program grants in one fell swoop, based on the long list of recipients on the email from DHS announcing these terminations. *See* Ex. A, J.R. 217-18.

subgrantees providing English classes, causing those services to end in second quarter of the year), J.R. 037 (forced to rely on unsustainable pro bono representation for naturalization clients and cut citizenship classes from four to one).

Defendants had already frozen Plaintiffs' grant funds indefinitely. *See* Dkt. 30-3, J.R. 2 (Defendants "unable to provide a timeline on this freeze."); *see also* Dkt. 30-1 at 13 ("As far as Plaintiffs know, their grants are frozen indefinitely."). Defendants' latest action, taken in the midst of briefing on preliminary relief, merely makes explicit what Defendants had previously made implicit: Defendants have decided that Plaintiffs' appropriated and awarded grant funds, for which they have diligently been providing services for months or years, will never be disbursed. If there were any doubt that Defendants have taken a final agency action, yesterday's termination letters confirm it. And the terminations compound the irreparable harms that Plaintiffs have already suffered and will continue to suffer.

Plaintiffs may seek leave to supplement their complaint under Federal Rule of Civil Procedure 15(d). But Plaintiffs do not believe that there is any need to adjust the existing briefing schedule or move the hearing currently scheduled for April 8, the expediency of which is necessary given Plaintiffs' ongoing and increasing harms. *See* Dkt. 29. Plaintiffs' brief in support of their motion for preliminary relief argues that the APA prohibits Defendants from stopping grant payments, arguments that apply regardless of whether Defendants label it an indefinite freeze or a termination. Dkt. 30-1 at 12-23. Specifically, Plaintiffs request that the Court order that Defendants "not pause, freeze, impede, or block the disbursement of grant funds." Proposed Order, Dkt. 30-2. What Defendants did yesterday is simply a further development in their existing funding freeze. So despite Defendants' attempt to escalate the harms, granting Plaintiffs' motion will return the parties to the status quo.

March 28, 2025

Niyati Shah<sup>+</sup>  
Shalaka Phadnis\*\*  
ASIAN AMERICANS ADVANCING  
JUSTICE—AAJC  
1620 L St. NW, Suite 1050  
Washington, DC 20036  
Phone: (202) 296-2318  
nshah@advancingjustice-aajc.org  
sphadnis@advancingjustice-aajc.org

Jose Perez\*\*  
LATINOJUSTICE PRLDEF,  
475 Riverside Dr., Suite 1901  
New York, NY 10115  
Phone: (212) 219-3360  
Fax: (212) 431-4276  
jperez@latinojustice.org

Nickole Durbin-Felix\*\*  
LATINOJUSTICE PRLDEF  
4700 Millenia Blvd., Suite 500  
Orlando, FL 32839  
Phone: (321) 247-6657  
ndurbin-felix@latinojustice.org

<sup>+</sup>*Application for full admission pending*

<sup>\*</sup>*Admitted pro hac vice*

<sup>\*\*</sup>*Motion to appear pro hac vice forthcoming*

Respectfully submitted,

/s/ Bradley Girard  
Bradley Girard (Bar No. 31437)  
Sarah M. Rich\*  
Adnan Perwez\*  
Robin F. Thurston<sup>+</sup>  
DEMOCRACY FORWARD FOUNDATION  
P.O. Box 34553  
Washington, DC 20043  
Phone: (202) 448-9090  
Fax: (202) 796-4426  
bgirard@democracyforward.org  
srich@democracyforward.org  
aperwez@democracyforward.org  
rthurston@democracyforward.org

*Counsel for Plaintiffs*