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April 29, 2025

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**U.S. Office of Management and Budget**

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**Department of Health and Human Services**

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FOIA Requester Service Center

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**U.S. Federal Communications  
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**Department of Defense**  
U.S. Department of Defense  
Freedom of Information Division  
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**U.S. Department of the Interior**  
Attn: FOIA  
1849 C Street, NW  
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**U.S. Department of Homeland Security**  
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The Privacy Office  
245 Murray Lane SW  
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*Sent via Federal Express and electronic mail*

**Subject: Freedom of Information Act Request**

Dear FOIA Officers:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.*, and applicable agency regulations, the Center for Constitutional Rights (“CCR,” “Requester”) submits a request for records from the below-listed federal agencies (“Request”). Please direct this request to all appropriate offices, field offices, departments, bureaus, missions, and officials within each agency, including but not limited to:

- **U.S. Department of Justice (“DOJ”):** The Civil Division; the Civil Rights Division; the Executive Office for Immigration Review; the Executive Office for U.S. Attorneys; Office of the Solicitor General; Office of Justice Programs (“OJP”); Office of Public Affairs, Office of Legal Counsel; Office of Legal Policy; Office on Violence Against Women; Office of Juvenile Justice and Delinquency Prevention (“OJJDP”); Federal Bureau of Prisons (“BOP”).
- **U.S. Department of Health and Human Services (“HHS”):** National Institutes of Health (“NIH”) including its components such as but not limited to the National Institute of Child

Health and Human Development (“NICHD”) and the Office of Extramural Research; National Science Foundation (“NSF”); Health Resources and Services Administration (“HRSA”); Centers for Medicare & Medicaid Services (“CMS”).

- **Office of Personnel Management (“OPM”):** Director’s Office; Office of the Deputy Director; Office of the Deputy Director for Management; Office of Information and Regulatory Affairs (“OIRA”); Office of Federal Financial Management; Resource Management Offices; Office of Communications; Office of General Counsel.
- **U.S. Department of Housing and Urban Development (“HUD”):** Office of the Secretary; Office of Fair Housing and Equal Opportunity; Office of Community Planning and Development.
- **U.S. Treasury Department (“Treasury”):** Bureau of Fiscal Service; Internal Revenue Service (“IRS”).
- **U.S. Department of State (“DOS”):** Bureau of Global Health Security and Diplomacy; Bureau of Intelligence and Research; Bureau of Legislative Affairs; Counselor of the Department; Executive Secretariat; Office of Civil Rights; Office of Global Women’s Issues; Office of the Chief of Protocol; Office of the Legal Adviser; Office of the Ombuds; Office of the Security Coordinator; Policy Planning Staff.
- **U.S. Agency for International Development (“USAID”):** Office of the Administrator; Regional Bureau.
- **U.S. Equal Employment Opportunity Commission (“EEOC”):** EEOC Headquarters. Office of the Chair; Office of Legal Counsel; New York District Office; Birmingham District Office; Chicago District Office; Detroit Field Office; San Francisco District Office.
- **Social Security Administration (“SSA”):** Operations; Disability Adjudication; Mission Support; External Affairs; General Counsel/Law and Policy; Information Office.
- **U.S. Federal Communications Commission (“FCC”):** General Counsel; Inspector General; Consumer & Governmental Affairs Bureau (“CGB”); Enforcement Bureau (“EB”); Media Bureau (“MB”); Wireless Telecommunications Bureau; Public Safety and Homeland Security Bureau.
- **U.S. Department of Defense (“DOD”):** Policy; Comptroller; Personnel and Readiness.
- **U.S. Department of Interior (“DOI”):** Bureau of Indian Affairs (“BIA”); Bureau of Indian Education (“BIE”); Bureau of Land Management (“BLM”); National Park Service (“NPS”); Bureau of Reclamation (“BOR”); Office of the Inspector General (“OIG”); Office of the Secretary (“OS”); Office of the Solicitor (“SOL”).
- **U.S. Department of Homeland Security (“DHS”):** U.S. Citizenship and Immigration Services (“USCIS”); Transportation Security Administration (“TSA”); United States Coast Guard (“USCG”); Federal Law Enforcement Training Centers (“FLETC”); Management Directorate; Science and Technology Directorate (S&T); Office of Health Security (“OHS”); Ombudsman Offices; Office for Civil Rights and Civil Liberties (“CRCL”).

## A. Background/Purpose of Request

This Request seeks records and communications pertaining to how various federal executive agencies interpret and plan to enforce recent Executive Orders impacting lesbian, gay, bisexual, transgender, non-binary, gender nonconforming, intersex, asexual, and queer (collectively, “LGBTQIA+”) individuals. The Request seeks these documents from the period starting January 20, 2025 continuing through to the time this request is reviewed.

Since President Donald Trump’s inauguration on January 20, 2025, he has released various Executive Orders specifically targeting LGBTQIA+ individuals, and the governmental and non-governmental actors that serve them, including healthcare providers, researchers, and even law firms.<sup>1</sup> The vagueness of the Executive Orders have caused widespread fear among LGBTQIA+ Americans concerned about their access to healthcare,<sup>2</sup> ability to use restrooms and school locker rooms,<sup>3</sup> obtain accurate federal identification documents,<sup>4</sup> travel abroad,<sup>5</sup> play on their school sports teams,<sup>6</sup> serve in the military or access benefits associated with their service,<sup>7</sup> or receive safe housing placements when in federal custody or federally managed social services and homelessness programs.<sup>8</sup> The Executive Orders have also unleashed additional harms to LGBTQIA+ people of color, as well as people living with HIV/AIDS.<sup>9</sup> These Executive Orders appear to be an expression of the Presidential administration’s animus towards LGBTQIA+

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<sup>1</sup> Ivana Saric, *All of the anti-trans executive orders Trump has signed*, AXIOS (Feb. 5, 2025), <https://www.axios.com/2025/02/05/anti-trans-executive-orders-trump>; Geoff Mulvihill, *6 ways Trump’s executive orders are targeting transgender people*, PBS NEWS (Feb. 1, 2025), <https://www.pbs.org/newshour/politics/6-ways-trumps-executive-orders-are-targeting-transgender-people>.

<sup>2</sup> Caroline Medina, Gray Babbs, Sara Mar, Jaclyn M.W. Hughto & Elizabeth Tobin-Tyler, *What Do The Trump Executive Orders Mean For The Health Of Trans Americans?*, HEALTH AFFS. (Feb. 13, 2025), <https://www.healthaffairs.org/content/forefront/do-trump-executive-orders-mean-health-trans-americans>.

<sup>3</sup> Brooke Migdon & Rebecca Beitsch, *Federal agencies ordered to implement transgender bathroom ban*, THE HILL (Jan. 30, 2025), <https://thehill.com/homenews/lgbtq/5117077-trump-transgender-bathroom-ban-opm-gender-ideology/>.

<sup>4</sup> Jaclyn Diaz, *Trump’s passport policy leaves trans, intersex Americans in the lurch*, NPR (Feb. 21, 2025), <https://www.npr.org/2025/02/21/nx-s1-5300880/trump-passport-policy-trans-gender-intersex-nonbinary>.

<sup>5</sup> *Id.*

<sup>6</sup> Will Graves, *Trump signs executive order intended to bar transgender athletes from girls’ and women’s sports*, AP NEWS (Feb. 5, 2025), <https://apnews.com/article/donald-trump-transgender-athletes-3606411fc12effec95a893351624e1b>.

<sup>7</sup> Scott Neuman, *Pentagon plans to begin removing trans service members from the military next month*, NPR (Mar. 1, 2025), <https://www.npr.org/2025/02/27/g-s1-51057/transgender-soldiers-military-ban-trump>.

<sup>8</sup> Beth Schwartzapfel, *Trump’s executive order sows confusion for transgender federal prisoners*, THE 19<sup>TH</sup> (Feb. 11, 2025), <https://19thnews.org/2025/02/trump-trans-order-federal-prisoners/>; Press Release, U.S. Dep’t of Hous. & Urban Dev., Secretary Scott Turner Halts Enforcement Actions of HUD’s Gender Identity Rule (Feb. 10, 2025), <https://www.hud.gov/news/hud-no-25-026>; see also HUDChannel, *Secretary Turner Halts Enforcement Actions of Gender Identity Rule*, YouTube (Feb. 10, 2025), <https://www.youtube.com/watch?v=VyTGFmDtyTI>.

<sup>9</sup> Samantha Riedel, *NIH Orders Researchers to Halt HIV Prevention Program for Trans Youth of Color*, THEM (Feb. 5, 2025), <https://www.them.us/story/nih-orders-researchers-halt-hiv-prevention-program-trans-youth-of-color>; Leah Feiger et al., *The CDC Has Been Guttled*, WIRED (Apr. 1, 2025), <https://www.wired.com/story/cdc-guttled-rif/>.

Americans,<sup>10</sup> even though it is well-settled that pure animus against an unpopular group may never serve legitimate governmental interests.<sup>11</sup>

Against this background, CCR is deeply concerned about the widespread deleterious impacts the agency implementations of these Executive Orders will have on an already marginalized population. CCR has historically represented LGBTQIA+ clients, particularly those seeking emergency shelter or in federal custody. We seek the information that is the subject of this Request in order to better advise our clients in this moment of heightened precarity and confusion, and to prepare the LGBTQIA+ public for how the federal government plans to interpret and enforce these Executive Orders, and how that enforcement may impact their lives or inform their choices. We also seek this information in order to better understand the rationales and motives behind agency actions and interpretations of these Executive Orders, especially if those interpretations or enforcement actions are discriminatory in practice or intent. Our interests in these records are rooted in a desire for government transparency.

## B. Definitions

- **Record(s).** In this Request the term “Record(s)” includes, but is not limited to, all records or communications preserved in electronic (including metadata) or hardcopy form, such as correspondences, emails, documents, data, videotapes, audio tapes, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other record of any kind.
- **Communication(s).** In this Request, the term “Communication” means the transmittal of information (in the forms of facts, ideas, inquiries, or otherwise), including but not limited to emails, texts, voicemails, faxes, letters, messages including Microsoft Teams/Zoom/Slack/Signal/WhatsApp messages, and/or any other type of electronic or non-electronic communication.
- **Data Compilations(s).** In this Request, the term “Data Compilation” means any aggregation, summary, table, list, spreadsheet, report, extract, or other assembled presentation of data—whether structured or unstructured—that reflects or is derived from one or more data systems, databases, tracking tools, forms, logs, case management software, or electronic records maintained or accessed by the agency.
- **Agency.** In this request, the term “Agency” means the federal agency that is the subject of a specific FOIA request and each of its divisions, departments, field offices, secretaries, directors, commissioners, employees, agents, representatives, consultants, contractors, personnel, and any other person authorized to act on its behalf.

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<sup>10</sup> Bill Barrow, *Trump and Vance make anti-transgender attacks central to their campaign’s closing argument*, AP NEWS (Nov. 1, 2024), <https://apnews.com/article/trump-harris-transgender-politics-61cff97a64fac581ffc5f762be4c57d3>; Odette Yousef, *Trump’s anti-trans effort is an agenda cornerstone with echoes in history*, NPR (Feb. 6, 2025), <https://www.npr.org/2025/02/06/nx-s1-5288145/trump-anti-trans-executive-order/>.

<sup>11</sup> See, e.g., *Dep’t of Agric. v. Moreno*, 413 U.S. 528 (1973); *City of Cleburne v. Cleburne Living Ctr., Inc.*, 473 U.S. 432 (1985); *Romer v. Evans*, 517 U.S. 620 (1996).

- **Designated Custodians.** In this request, unless otherwise specified for a respective Agency, this term means persons who have held the following positions since January 20, 2025 at each respective federal executive Agency, in an acting, interim, or Senate-confirmed capacity: Director, Chair, Secretary, Head (or equivalent employee level within the agency regardless of official title); the Vice Chair, Deputy Secretary, or Deputy Head; Commissioners; Deputy Commissioner; Chiefs of Staff; and Undersecretaries or Assistance Secretaries (or equivalent employee level within the agency regardless of official title); General Counsel; Deputy General Counsel; Inspector General(s); District Director(s); Human Capital Officers; Human Resource Officers; EEOC Regional Attorney(s); EEOC Assistant Regional Attorney(s); and all employees in positions classified as either Senior Executive Service officials and/or above General Schedule (GS) grade 15.
- **LGBTQIA+.** In this request, the term “LGBTQIA+” refers to all of the following: people who are gay, lesbian, bisexual, pansexual, trans, transgender, two-spirit, non-binary, gender non-conforming, intersex, asexual and/or queer. LGBTQIA+ people with gender dysphoria, people whose gender identity differs from their sex assigned at birth, people who identify as neither male nor female.

### C. Limitations on Time and Scope, and Search Terms

The time period for this Request is from January 20, 2025 to Present (i.e., the date when the searches commence). In addition, all requests for Records and Communications are limited to Records and Communications in the possession of the Designated Custodians except where otherwise indicated.

To facilitate Communications searches, CCR proposes the following search terms (including plurals, hyphenations, and common variations): “gay”; “lesbian”; “bisexual”; “transgender”; “tranny”; “trannies”; “transsexual”; “transvestite”; “gender”; “DEI”; “DEIA”; “diversity”; “biological”; “sexual orientation”; “intersex”; “LGBT”; “LGBTQ”; “LGBTQIA”; “nonbinary”; “Bostock”; “Skrametti”; “mutilation”; “gender ideology”; “gender identity”; “gender expression”; “sex change”; “sex-trait modification”; “affirming care”; “pronouns”; “indoctrination”; “they/them”; and “mother and father” (collectively, “Proposed Search Terms”).

### D. Request for Information

#### I. From the Department of Justice (“DOJ”)

- A. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
  1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))



3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Radical Indoctrination in K-12 Schooling* (January 2025) ([Link](#))
  6. Executive Order titled *Keeping Men Out of Women’s Sports* (February 2025) ([Link](#))
  7. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  8. Executive Order titled *Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative* (February 2025) ([Link](#))
- B. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. A above, including without limitation agency compliance actions or plans.
- C. All Records or Communications related to the removal or modification of Agency websites<sup>12</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;
  2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- D. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
1. agency actions taken in response and Defending Women Executive Order;
  2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- E. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- F. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>13</sup> including without limitation:

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<sup>12</sup> Examples of such words that have been reportedly removed from public government websites such as but not limited to “transgender,” “pregnant person,” “intersex,” and “queer.” See, e.g., Jonathan Cooper, *A list of government web pages that have gone dark to comply with Trump orders*, AP NEWS (Jan. 31, 2025), <https://apnews.com/article/government-websites-changes-trump-transgender-dei-orders-383fc983c6ca48804f1404cbc61ee9e9>; Julie Steenhuisen & Ted Hesson, *US health agencies scrubbing websites to remove ‘gender ideology’*, REUTERS (Jan. 31, 2025), <https://www.reuters.com/world/us/us-health-agencies-scrubbing-websites-remove-gender-ideology-2025-01-31/>.

<sup>13</sup> See, e.g., Cecilia Kang, *F.C.C. Chairman Orders Inquiry Into Disney’s D.E.I. Practices*, N.Y. TIMES (Mar. 28, 2025), <https://www.nytimes.com/2025/03/28/technology/disney-fcc-dei-investigation.html>; U.S. Equal Emp. Opp.

1. records identifying the entity subject to investigation;<sup>14</sup>
  2. the subject matter or nature of such investigations or enforcement actions;
  3. the dates such investigations or enforcement actions were opened;
  4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
  5. the current status of each matter (e.g., open, closed, resolved, referred).
- G. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms or keywords used;
  2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  3. instructions given to Agency personnel related to grantee communications;
  4. any templates used for termination letters.
- H. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
1. the name of the grantee;<sup>15</sup>
  2. the project name;
  3. the number or other agency identifier;
  4. the grant amount;
  5. and the basis for the grant termination where available.
- I. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- J. All Communications including the Proposed Search Terms.

## II. From the Department of Health and Human Services (“HHS”)

- A. All Records related to the March 5, 2025 letter from the Centers for Medicare & Medicaid Services (CMS) titled *Protecting Children from Chemical and Surgical Mutilation* ([Link](#)).
- B. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):

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Comm’n (EEOC), *EEOC Acting Chair Andrea Lucas Sends Letters to 20 Law Firms Requesting Information About DEI-Related Employment Practices*, EEOC (Mar. 17, 2025), <https://www.eeoc.gov/newsroom/eeoc-acting-chair-andrea-lucas-sends-letters-20-law-firms-requesting-information-about-dei>.

<sup>14</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

<sup>15</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.



1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Radical Indoctrination in K-12 Schooling* (January 2025) ([Link](#))
  6. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- C. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. B above, including without limitation agency compliance actions or plans.
- D. All Records or Communications related to the removal or modification of Agency websites<sup>16</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;
  2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- E. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
1. agency actions taken in response and Defending Women Executive Order;
  2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- F. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- G. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>17</sup> including without limitation:
1. records identifying the entity subject to investigation;<sup>18</sup>
  2. the subject matter or nature of such investigations or enforcement actions;
  3. the dates such investigations or enforcement actions were opened;

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<sup>16</sup> *Supra* note 12.

<sup>17</sup> *Supra* note 13.

<sup>18</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
  5. the current status of each matter (e.g., open, closed, resolved, referred).
- H. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms or keywords used;
  2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  3. instructions given to Agency personnel related to grantee communications;
  4. any templates used for termination letters.
- I. list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
1. the name of the grantee;<sup>19</sup>
  2. the project name;
  3. the number or other agency identifier;
  4. the grant amount;
  5. and the basis for the grant termination where available.
- J. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- K. All Communications including the Proposed Search Terms.
- III. From the Office of Personnel Management (“OPM”)
- A. All final Memorandums or Guidance issued by OPM since January 20, 2025 in response to any of the Designated Executive Orders.
- B. All Records and Communications sent or received by [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov) related to the implementation, enforcement, or compliance with the Defending Women Executive Order and/or OPM Guidance, including without limitation agency actions and agency plans.
- C. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))

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<sup>19</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- D. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. C above, including without limitation agency compliance actions or plans.
- E. All Records or Communications related to the removal or modification of Agency websites<sup>20</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;
  2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- F. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
1. agency actions taken in response and Defending Women Executive Order;
  2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- G. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- H. All Communications including the Proposed Search Terms.

#### IV. From the Department of Housing and Urban Development (“HUD”)

- A. All Records or Communications related to the 2016 final rule Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs,<sup>21</sup> and any decisions regarding its enforcement.<sup>22</sup>

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<sup>20</sup> *Supra* note 12.

<sup>21</sup> *Equal Access in Accordance With an Individual’s Gender Identity in Community Planning and Development Programs*, 81 Fed. Reg. 64763 (Sept. 21, 2016), <https://www.federalregister.gov/documents/2016/09/21/2016-22589/equal-access-in-accordance-with-an-individuals-gender-identity-in-community-planning-and-development>.

<sup>22</sup> Press Release, U.S. Dep’t of Hous. & Urban Dev., Secretary Scott Turner Halts Enforcement Actions of HUD’s Gender Identity Rule (Feb. 10, 2025), <https://www.hud.gov/news/hud-no-25-026>; see also HUDChannel, *Secretary Turner Halts Enforcement Actions of Gender Identity Rule*, YouTube (Feb. 10, 2025), <https://www.youtube.com/watch?v=VyTGFmDtyTI>.

- B. All Records or Communications related to the 2020 proposed rule Making Admission or Placement Determinations Based on Sex in Facilities Under Community Planning and Development Housing Programs,<sup>23</sup> which was withdrawn in 2021.<sup>24</sup>
- C. All Records or Communications related to the 2021 interim final rule Restoring Affirmatively Furthering Fair Housing Definitions and Certifications,<sup>25</sup> the 2023 proposed rule Affirmatively Furthering Fair Housing,<sup>26</sup> its withdrawal,<sup>27</sup> the 2025 interim final rule Affirmatively Furthering Fair Housing Revisions,<sup>28</sup> and any subsequent action taken.
- D. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency's interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter "Designated Executive Orders and Guidance"):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* ("Defending Women Executive Order") (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* ("DEI Executive Order") (January 2025) ([Link](#))
  - 4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* ("OPM Guidance") (January 2025) ([Link](#))
  - 5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- E. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. D above, including without limitation agency compliance actions or plans.

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<sup>23</sup> *Making Admission or Placement Determinations Based on Sex in Facilities Under Community Planning and Development Housing Programs*, 85 Fed. Reg. 44811 (July 24, 2020), <https://www.federalregister.gov/documents/2020/07/24/2020-14718/making-admission-or-placement-determinations-based-on-sex-in-facilities-under-community-planning-and-development-housing-programs>.

<sup>24</sup> *Making Admissions or Placement Determinations Based on Sex in Facilities Under Community Planning and Development Housing Programs*; Withdrawal; Regulatory Review, 86 Fed. Reg. 22125 (Apr. 27, 2021), <https://www.federalregister.gov/documents/2021/04/27/2021-08513/making-admission-or-placement-determinations-based-on-sex-in-facilities-under-community-planning-and-development-housing-programs>.

<sup>25</sup> *Restoring Affirmatively Furthering Fair Housing Definitions and Certifications*, 86 Fed. Reg. 30779 (June 10, 2021), <https://www.federalregister.gov/documents/2021/06/10/2021-12114/restoring-affirmatively-furthering-fair-housing-definitions-and-certifications>.

<sup>26</sup> *Affirmatively Furthering Fair Housing*, 88 Fed. Reg. 8516 (Feb. 9, 2023), <https://www.govinfo.gov/content/pkg/FR-2023-02-09/pdf/2023-00625.pdf>.

<sup>27</sup> *Affirmatively Furthering Fair Housing*; Withdrawal, 90 Fed. Reg. 4687 (Jan. 16, 2025), <https://www.federalregister.gov/documents/2025/01/16/2025-00981/affirmatively-furthering-fair-housing-withdrawal>.

<sup>28</sup> *Affirmatively Furthering Fair Housing Revisions*, 90 Fed. Reg. 11020 (Mar. 3, 2025), <https://www.federalregister.gov/documents/2025/03/03/2025-03360/affirmatively-furthering-fair-housing-revisions>.

- F. All Records or Communications related to the removal or modification of Agency websites<sup>29</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;
  2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- G. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
1. agency actions taken in response and Defending Women Executive Order;
  2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- H. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- I. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>30</sup> including without limitation:
1. records identifying the entity subject to investigation;<sup>31</sup>
  2. the subject matter or nature of such investigations or enforcement actions;
  3. the dates such investigations or enforcement actions were opened;
  4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
  5. the current status of each matter (e.g., open, closed, resolved, referred).
- J. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms or keywords used;
  2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  3. instructions given to Agency personnel related to grantee communications;
  4. any templates used for termination letters.
- K. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
1. the name of the grantee;<sup>32</sup>

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<sup>29</sup> *Supra* note 12.

<sup>30</sup> *Supra* note 13.

<sup>31</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

<sup>32</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

2. the project name;
  3. the number or other agency identifier;
  4. the grant amount;
  5. and the basis for the grant termination where available.
- L. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- M. All Communications including the Proposed Search Terms.
- V. From the Department of Veterans Affairs (“VA”)
- A. All Agency policies, enforcement manuals, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records updated or created since January 20, 2025 related to the provision of gender-affirming medical treatment for those with a history of, diagnosed with, or exhibiting symptoms consistent with gender dysphoria including but not limited to:<sup>33</sup>
1. Hormone therapy or hormone replacement therapy;
  2. Voice and communication training;
  3. Gender-affirming surgeries such as vaginoplasty, facial feminization surgery, facial masculinization surgery, metoidioplasty, orchiectomy, oophorectomy, voice feminization surgery, breast augmentation, hysterectomy, phalloplasty, chest restructuring surgery (or “top surgery”), vulvoplasty, chondrolaryngoplasty, genitourinary reconstruction surgery, penectomy, and scrotoplasty (or “oscheoplasty”);
  4. Gender-affirming items such as breast forms, chest binders, dilator sets, packers, gaffs, surgical compression vests, and wigs.
- B. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))

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<sup>33</sup> We are not requesting individual medical records or any personally identifying information.



- C. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. B above, including without limitation agency compliance actions or plans.
- D. All Records or Communications related to the removal or modification of Agency websites<sup>34</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- E. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;
  - 2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- F. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- G. All Communications including the Proposed Search Terms.

## VI. From the Department of Treasury

- A. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency's interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter "Designated Executive Orders and Guidance"):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* ("Defending Women Executive Order") (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* ("DEI Executive Order") (January 2025) ([Link](#))
  - 4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* ("OPM Guidance") (January 2025) ([Link](#))
  - 5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  - 6. Executive Order titled *Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative* (February 2025) ([Link](#))

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<sup>34</sup> *Supra* note 12.

- B. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. A above, including without limitation agency compliance actions or plans.
- C. All Records or Communications related to the removal or modification of Agency websites<sup>35</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- D. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;
  - 2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- E. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- F. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>36</sup> including without limitation:
  - 1. records identifying the entity subject to investigation;<sup>37</sup>
  - 2. the subject matter or nature of such investigations or enforcement actions;
  - 3. the dates such investigations or enforcement actions were opened;
  - 4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
  - 5. the current status of each matter (e.g., open, closed, resolved, referred).
- G. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms or keywords used;
  - 2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  - 3. instructions given to Agency personnel related to grantee communications;
  - 4. any templates used for termination letters.

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<sup>35</sup> *Supra* note 12.

<sup>36</sup> *Supra* note 13.

<sup>37</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

- H. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
  - 1. the name of the grantee;<sup>38</sup>
  - 2. the project name;
  - 3. the number or other agency identifier;
  - 4. the grant amount;
  - 5. and the basis for the grant termination where available.
- I. All Communications including the Proposed Search Terms.

VII. From the Department of State (“DOS”)

- A. All Agency policies, enforcement manuals, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records updated or created since January 20, 2025 related to LGBTQIA+ people and/or gender markers and any of the following:
  - 1. passports, including existing passports and passport renewals;<sup>39</sup>
  - 2. visas;<sup>40</sup>
  - 3. green cards or permanent residency;
  - 4. asylum;
  - 5. temporary protected status;
  - 6. protection against removal;
  - 7. Consular Reports of Birth Abroad;
  - 8. applications for items (1)-(7) above;
- B. A copy of the February 24, 2025 cable from Marco Rubio to visa officers related to the application of Immigration and Nationality Act § 212(a)(6)(C)(i), and any Records or Communications related to the Cable.<sup>41</sup>
- C. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))

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<sup>38</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

<sup>39</sup> We are not requesting records of individual passport applicants or applications.

<sup>40</sup> We are not seeking records of individual applicants or applications for a Consular Report of Birth Abroad, visa, or permanent residency.

<sup>41</sup> Joseph Gedeon, *US threatens permanent visa bans on trans athletes based on sex markers*, The Guardian (Feb. 28, 2025), <https://www.theguardian.com/us-news/2025/feb/25/visa-ban-transgender-athletes>.

4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Keeping Men Out of Women’s Sports* (February 2025) ([Link](#))
  6. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  7. Executive Order titled *Reevaluating and Realigning US Foreign Aid* (January 2025) ([Link](#))
- D. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. C above, including without limitation agency compliance actions or plans.
  - E. All Records or Communications related to the removal or modification of Agency websites<sup>42</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
    1. the criteria, search terms, or keywords used;
    2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
    3. any Data Compilations identifying Agency websites so modified.
  - F. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
    1. agency actions taken in response and Defending Women Executive Order;
    2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
  - G. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
  - H. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>43</sup> including without limitation:
    1. records identifying the entity subject to investigation;<sup>44</sup>
    2. the subject matter or nature of such investigations or enforcement actions;
    3. the dates such investigations or enforcement actions were opened;
    4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
    5. the current status of each matter (e.g., open, closed, resolved, referred).
  - I. Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or

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<sup>42</sup> *Supra* note 12.

<sup>43</sup> *Supra* note 13.

<sup>44</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:

1. the criteria, search terms or keywords used;
  2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  3. instructions given to Agency personnel related to grantee communications;
  4. any templates used for termination letters.
- J. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
1. the name of the grantee;<sup>45</sup>
  2. the project name;
  3. the number or other agency identifier;
  4. the grant amount;
  5. and the basis for the grant termination where available.
- K. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- L. All Communications including the Proposed Search Terms.

#### VIII. From U.S. Agency for International Development (“USAID”)

- A. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  6. Executive Order titled *Reevaluating and Realigning US Foreign Aid* (January 2025) ([Link](#))
- B. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. A above, including without limitation agency compliance actions or plans.

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<sup>45</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

- C. All Records or Communications related to the removal or modification of Agency websites<sup>46</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- D. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;
  - 2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- E. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- F. All Records and Communications between the Designated Custodians and Agency personnel related to the modification, nonrenewal, or termination of Agency grants or funding pursuant to the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms or keywords used;
  - 2. the rationale for all such terminations of funding, including the relevant Executive Order(s);
  - 3. instructions given to Agency personnel related to grantee communications;
  - 4. any templates used for termination letters.
- G. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
  - 1. the name of the grantee;<sup>47</sup>
  - 2. the project name;
  - 3. the number or other agency identifier;
  - 4. the grant amount;
  - 5. and the basis for the grant termination where available.
- H. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- I. All Communications including the Proposed Search Terms.

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<sup>46</sup> *Supra* note 12.

<sup>47</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.



IX. From the Social Security Administration (“SSA”)

- A. All Agency policies, enforcement manuals, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records updated or created since January 20, 2025 related to LGBTQIA+ people and/or gender markers on supplemental security income (SSI) cards.
- B. All Records related to the March 5, 2025 letter from the Centers for Medicare & Medicaid Services (CMS) titled *Protecting Children from Chemical and Surgical Mutilation* ([Link](#)).
- C. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  - 4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  - 5. Executive Order titled *Keeping Men Out of Women’s Sports* (February 2025) ([Link](#))
  - 6. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  - 7. Executive Order titled *Restoring Truth and Sanity to American History* (March 2025) ([Link](#))
- D. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. C above, including without limitation agency compliance actions or plans.
- E. All Records or Communications related to the removal or modification of Agency websites<sup>48</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- F. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;

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<sup>48</sup> *Supra* note 12.

2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- G. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- H. All Communications including the Proposed Search Terms.
- X. From the Equal Employment Opportunity Commission ("EEOC")
- A. All Records or Communications sent or received by the Designated Custodians related to EEOC's litigation and/or voluntary dismissal of the following cases<sup>49</sup> pursuant to the *Defending Women* Executive Order:
    1. *EEOC v. Boxwood Hotels, LLC et al*, 1:24-cv-00902-LJV (W.D.N.Y.)
    2. *EEOC v. Sis-Bro, Inc.*, 3:24-cv-00968-JPG (S.D. Ill.)
    3. *EEOC v. Reggio's Pizza*, 1:24-cv-08910 (N.D. Ill.)
    4. *EEOC v. Lush Handmade Cosmetics, LLC et al*, 5:24-cv-06859-PCP (N.D. Cal.)
    5. *EEOC v. Harmony Hospitality, LLC*, 1:24-cv-00357-CWB (M.D. Ala.)
    6. *EEOC v. Brik Enterprises*, 24-cv-12817 (E.D. Mich.)
    7. *EEOC v. Starboard with Cheese LLC*, 3:24-cv-02260 (S.D. Ill.)
  - B. All Records or Communications related to changes to the EEOC's handling, processing, investigation, or litigation of charges of discrimination filed by any of the following since January 20, 2025:
    1. trans or transgender complainant(s)
    2. non-binary complainant(s)
    3. intersex complainants(s)
    4. gender non-confirming complainant(s)
    5. gay or lesbian complainant(s)
    6. bisexual or pansexual complainant(s)
    7. queer complainants(s)
    8. asexual complainant(s)
  - C. All Agency policies, enforcement manuals, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records updated or created since January 20, 2025 related to the EEOC's handling, processing, investigation, or litigation of charges of discrimination alleging any of the following:
    1. sex discrimination
    2. sexual orientation discrimination
    3. gender identity discrimination
    4. discrimination in violation of *Bostock*
  - D. All Agency policies, enforcement manuals, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records updated or created since January 20, 2025 related to the EEOC's handling, processing, investigation, or

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<sup>49</sup> The Requester does not want copies of the cases themselves.

litigation of charges of discrimination bearing any of the following codes in the EEOC's Integrated Mission System (IMS) and/or Agency Records Center (ARC):

1. Project Codes:
    - i. Bostock Transgender Status
    - ii. Diversity, Equity, and Inclusion (DEI)
    - iii. Transgender Status
  2. Basis Codes:
    - iv. Sex – Transgender Status
    - v. Sex – Sexual Orientation
- E. All Records or Communications related to the EEOC's March 17, 2025 compliance review letters requesting information from law firms ("Compliance Review Request"),<sup>50</sup> including identifying:
1. basis for the EEOC's purported authority to seek documents and information pursuant to the Compliance Review Request;
  2. the criteria used to select law firms subject to the Compliance Review Request;
  3. any responses received to the Compliance Review Request.
- F. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency's interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter "Designated Executive Orders and Guidance"):
1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* ("Defending Women Executive Order") (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* ("DEI Executive Order") (January 2025) ([Link](#))
  4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* ("OPM Guidance") (January 2025) ([Link](#))
  5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- G. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. F above, including without limitation agency compliance actions or plans.
- H. All Records or Communications related to the removal or modification of Agency websites<sup>51</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;

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<sup>50</sup> U.S. Equal Emp. Opp. Comm'n (EEOC), *EEOC Acting Chair Andrea Lucas Sends Letters to 20 Law Firms Requesting Information About DEI-Related Employment Practices*, EEOC (Mar. 17, 2025), <https://www.eeoc.gov/newsroom/eeoc-acting-chair-andrea-lucas-sends-letters-20-law-firms-requesting-information-about-dei>.

<sup>51</sup> *Supra* note 12.

2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- I. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
    1. agency actions taken in response and Defending Women Executive Order;
    2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
  - J. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
  - K. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>52</sup> including without limitation:
    1. records identifying the entity subject to investigation;<sup>53</sup>
    2. the subject matter or nature of such investigations or enforcement actions;
    3. the dates such investigations or enforcement actions were opened;
    4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
    5. the current status of each matter (e.g., open, closed, resolved, referred).
  - L. All Communications including the Proposed Search Terms.
- XI. From the Federal Communications Commission ("FCC")
- A. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency's interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter "Designated Executive Orders and Guidance"):
    1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
    2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* ("Defending Women Executive Order") (January 2025) ([Link](#))
    3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* ("DEI Executive Order") (January 2025) ([Link](#))
    4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* ("OPM Guidance") (January 2025) ([Link](#))
    5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))

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<sup>52</sup> *Supra* note 13.

<sup>53</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

- B. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. A above, including without limitation agency compliance actions or plans.
- C. All Records or Communications related to the removal or modification of Agency websites<sup>54</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- D. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;
  - 2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- E. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- F. Records related to any investigations or enforcement actions initiated by the Agency since January 20, 2025 against non-governmental entities (i.e. employers, corporations, non-profit organizations) in connection with the Designated Executive Orders and Guidance,<sup>55</sup> including without limitation:
  - 1. records identifying the entity subject to investigation;<sup>56</sup>
  - 2. the subject matter or nature of such investigations or enforcement actions;
  - 3. the dates such investigations or enforcement actions were opened;
  - 4. the components or offices within the Agency responsible for the investigations or enforcement actions; and
  - 5. the current status of each matter (e.g., open, closed, resolved, referred).
- G. All Communications including the Proposed Search Terms.

## XII. From the Department of Interior ("DOI")

- A. All Records of completed, contemplated, planned, or ongoing changes to public institutions including but not limited to the Independence National Historical Park, the Smithsonian Institution, National Museum of African American History and Culture effectuating the *Restoring Truth and Sanity to American History* Executive Order.
- B. List of all criteria used to determine whether the removal or changes to public monuments, memorials, statues, markers, or similar properties within the Department

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<sup>54</sup> *Supra* note 12.

<sup>55</sup> *Supra* note 13.

<sup>56</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

of the Interior’s jurisdiction since January 1, 2020 “perpetuate a false reconstruction of American history, inappropriately minimize the value of certain historical events or figures, or include any other improper partisan ideology” per the *Restoring Truth and Sanity to American History* Executive Order.

- C. List of all public monuments, memorials, statues, markers, or similar properties within the Department of the Interior’s jurisdiction subject to changes by the Secretary of the Interior per the *Restoring Truth and Sanity to American History* Executive Order.
- D. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  - 4. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  - 5. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
  - 6. Executive Order titled *Restoring Truth and Sanity to American History* (March 2025) ([Link](#))
- E. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. D above, including without limitation agency compliance actions or plans.
- F. All Records or Communications related to the removal or modification of Agency websites<sup>57</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
  - 1. the criteria, search terms, or keywords used;
  - 2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  - 3. any Data Compilations identifying Agency websites so modified.
- G. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
  - 1. agency actions taken in response and Defending Women Executive Order;
  - 2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.

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<sup>57</sup> *Supra* note 12.



- H. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- I. A list of grantees who received grant or funding termination letters pursuant to the Designated Executive Orders and Guidance identifying:
  - 1. the name of the grantee;<sup>58</sup>
  - 2. the project name;
  - 3. the number or other agency identifier;
  - 4. the grant amount;
  - 5. and the basis for the grant termination where available.
- J. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the modification, elimination, or rescission of agency departments, initiatives, programs, priorities, task forces, committees, and/or budgets pursuant to the Designated Executive Orders and Guidance.
- K. All Communications including the Proposed Search Terms.

### XIII. From the Department of Defense (“DOD”)

- A. Any Data Compilations identifying any offices, divisions, jobs, sub-offices, programs, elements, or other units of an institution deemed a “DEI office” in accordance with the Restoring America’s Fighting Force Executive Order.
- B. All Records of planned, contemplated, and ongoing changes to the leadership, curriculum, and instructors of the United States Service Academies and other defense academic institutions per the *Restoring America’s Fighting Force* Executive Order.
- C. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency’s interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter “Designated Executive Orders and Guidance”):
  - 1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))
  - 2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  - 3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  - 4. Executive Order titled *Restoring America’s Fighting Force* (January 2025) ([Link](#))
  - 5. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  - 6. Executive Order titled *Prioritizing Military Excellence and Readiness* (January 2025) ([Link](#))

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<sup>58</sup> The Requester is not seeking any personal identifying information for any individual grantees, but seeks the names of grantees that are organizations, institutions, or educational programs, etc.

7. Executive Order titled *Radical Indoctrination in K-12 Schooling* (January 2025) ([Link](#))
  8. Executive Order titled *Keeping Men Out of Women's Sports* (February 2025) ([Link](#))
  9. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- D. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. C above, including without limitation agency compliance actions or plans.
  - E. All Records or Communications related to the removal or modification of Agency websites<sup>59</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
    1. the criteria, search terms, or keywords used;
    2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
    3. any Data Compilations identifying Agency websites so modified.
  - F. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
    1. agency actions taken in response and Defending Women Executive Order;
    2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
  - G. Any Data Compilations related to the Agency's compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
  - H. All Communications including the Proposed Search Terms.

#### XIV. From the Department of Homeland Security ("DHS")

- A. Any Data Compilations identifying any offices, divisions, jobs, sub-offices, programs, elements, or other units of an institution deemed a "DEI office" in accordance with the Restoring America's Fighting Force Executive Order.
- B. All Records of planned, contemplated, and ongoing changes to the leadership, curriculum, and instructors of the United States Service Academies and other defense academic institutions per the *Restoring America's Fighting Force* Executive Order.
- C. Any policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records related to the Agency's interpretation, implementation, and/or enforcement of the following Executive Orders and guidance (hereinafter "Designated Executive Orders and Guidance"):
  1. Executive Order titled *Protecting Children from Chemical and Surgical Mutilation* (January 2025) ([Link](#))

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<sup>59</sup> *Supra* note 12.

2. Executive Order titled *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (“Defending Women Executive Order”) (January 2025) ([Link](#))
  3. Executive Order titled *Ending Radical and Wasteful Government DEI Programs and Preferencing* (“DEI Executive Order”) (January 2025) ([Link](#))
  4. Executive Order titled *Restoring America’s Fighting Force* (January 2025) ([Link](#))
  5. Office of Personnel Management Memorandum: *Initial Guidance Regarding Trump Executive Order on Defending Women* (“OPM Guidance”) (January 2025) ([Link](#))
  6. Executive Order titled *Prioritizing Military Excellence and Readiness* (January 2025) ([Link](#))
  7. Executive Order titled *Keeping Men Out of Women’s Sports* (February 2025) ([Link](#))
  8. Executive Order titled *Eradicating Anti-Christian Bias* (February 2025) ([Link](#))
- D. All Communications related to the interpretation, implementation, and/or enforcement of the Designated Executive Orders and Guidance and/or records responsive to Request No. C above, including without limitation agency compliance actions or plans.
- E. All Records or Communications related to the removal or modification of Agency websites<sup>60</sup> in connection with the Designated Executive Orders and Guidance, including but not limited to:
1. the criteria, search terms, or keywords used;
  2. policies, memorandum, guidance, directives, legal or policy advisories, white papers, orders, or similar Records;
  3. any Data Compilations identifying Agency websites so modified.
- F. All Agency Records or Communications, irrespective of custodian, sent to the Office of Personnel Management (OPM) in response to the Jan. 29, 2025 OPM Guidance, including without limitation [defendingwomen@opm.gov](mailto:defendingwomen@opm.gov), related to:
1. agency actions taken in response and Defending Women Executive Order;
  2. agency plans to comply with the OPM Guidance and *Defending Women* Executive Order.
- G. Any Data Compilations related to the Agency’s compliance with the Designated Executive Orders and Guidance, including internal assessments, reports, or tracking mechanisms.
- H. All Communications including the Proposed Search Terms.

## E. The Requester

The Center for Constitutional Rights (“CCR”) is a non-profit, public-interest legal and advocacy organization that engages in the fields of civil and international human rights. CCR’s diverse issue areas include litigation and advocacy around gender and LGBTQIA+ justice and prisoners’ rights. One of CCR’s primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current gender justice and LGBTQIA+ rights law issues, and other similar materials for public dissemination. These and other materials are available through

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<sup>60</sup> *Supra* note 12.

CCR's Development, Communications, and Advocacy Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which CCR works. CCR staff members often serve as sources for journalists and media outlets, including on issues related to gender and LGBTQIA+ justice, civil liberties, and prisoners' rights. In addition, CCR regularly issues press releases, has an active social media presence with tens of thousands of followers, and issues regular email updates to over 50,000 supporters about developments and news pertaining to CCR's work. CCR publishes and distributes the Jailhouse Lawyers Handbook, a self-help legal manual for incarcerated people to challenge rights violations and abuses.

## **F. Request for Fee Waiver**

CCR requests a waiver of all fees associated with this Request pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). CCR is a nonprofit organization (see Section C of this Request) seeking the requested information in the public interest and not for commercial purposes. CCR meets the requirements for a fee waiver because the subject of the request concerns the operations or activities of the government, the disclosure of the information is likely to contribute to a significant public understanding of government operations or activities, the Requester's primary interest is in disclosure, and they have no commercial interest in the information. *See* 28 C.F.R. § 16.10(k), 22 C.F.R. § 171.16(j), 45 C.F.R. § 5.54, 5 C.F.R. § 294.109(f), 24 C.F.R. § 15.106(k), 38 C.F.R. § 1.561(n), 29 C.F.R. § 1208.6(k), 22 C.F.R. § 171.16(j), 29 C.F.R. § 1610.15(k), 20 C.F.R. § 402.85, 45 C.F.R. § 5.54, 22 C.F.R. § 212.14(k), 43 C.F.R. §§ 2.48, 2.45, 32 C.F.R. § 286.12(l), 6 C.F.R. § 5.11(b).

CCR will make any information that they receive as a result of this FOIA request available to the public, including the press, at no cost. Disclosure in this case, therefore, meets the statutory criteria, and a fee waiver would fulfill Congress' legislative intent in amending FOIA. *See Judicial Watch Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) ("Congress amended FOIA to ensure that it be 'liberally construed in favor of waivers of noncommercial requesters.'") (citing *McClellan Ecological Seepage Situation v. Carlucci*, 835 F.2d 1282, 1284 (9th Cir. 1987)).

In the alternative, if no fee waiver is granted and the fees exceed \$250.00, please contact CCR's undersigned representative to obtain consent to incur additional fees. Processing fees should be limited pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) ("[F]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media").

## **G. Request for Expedited Processing**

CCR requests expedited processing of this FOIA Request pursuant to 5 U.S.C. § 552(a)(6)(E), 28 C.F.R. § 16.5(e)(1), 39 C.F.R. § 3006.200(e), 45 C.F.R. § 5.27, 5 C.F.R. § 294.108(f), 24 C.F.R. § 15.104(c)(2), 38 C.F.R. § 1.556(d), 31 C.F.R. § 1.4(e)(l)(i), 22 C.F.R. §§ 171.12(d)(1)(ii), (d)(1)(iii), 29 C.F.R. § 1610.9(f), 20 C.F.R. § 402.65, 47 C.F.R. § 0.461(h), 22 C.F.R. § 212.8(e), 43 C.F.R. § 2.20(b)(2), 32 C.F.R. § 286.8(e) and 6 C.F.R. § 5.5(e), as the requested information concerns matters of widespread public interest and urgency related to federal policy changes impacting civil rights, healthcare access, and gender-related protections. Accordingly, CCR requests an expedited processing determination within 10 days of the receipt of this FOIA Request on the ground that there is an immediate and compelling need for the information.

There is an urgent need to inform the public of the policies and decision-making regarding agency enforcement of the Designated Executive Orders and Guidance. In just three months, the administration's Executive Orders and agency enforcement of these Orders have already generated substantial and continuing news coverage. *Every* major outlet is covering this administration's impacts on LGBTQIA+ people, such as the New York Times,<sup>61</sup> the Guardian,<sup>62</sup> Reuters,<sup>63</sup> NBC News,<sup>64</sup> the Washington Post,<sup>65</sup> the Wall Street Journal,<sup>66</sup> AP News,<sup>67</sup> and BBC.<sup>68</sup>

The impact of the Designated Executive Orders and Guidance on the lives of LGBTQIA+ people cannot be understated, as news coverage has highlighted. For example, the rehousing of transgender, gender non-conforming, nonbinary, and/or intersex people under Bureau of Prisons custody to facilities designated for their sex assigned at birth places those inmates—who are already at heightened risk when incarcerated—in immediate greater physical danger.<sup>69</sup> And while the constitutionality of several of the Designated Executive Orders and Guidance is being challenged in federal court, the Executive Orders have nonetheless emboldened state legislators to introduce—and pass—a flurry of legislation aimed at further curtailing the rights of LGBTQIA+ people, and particularly the rights and safety of LGBTQIA+ youth.<sup>70</sup>

The speed with which legal protections for LGBTQIA+ people have been revoked raises serious concerns, and the numerosity and breadth of the Designated Executive Orders and Guidance has resulted in far-reaching panic and confusion within the LGBTQIA+ community, while simultaneously unleashing new waves of violence and bigotry against community members. LGBTQIA+ people also lack sufficient information to plan for their basic safety and wellbeing. The Trump Administration's actions targeting LGBTQIA+ people have sparked national protest

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<sup>61</sup> Talya Minsberg, *What We Know About Trump's New Executive Order on Trans Athletes*, N.Y. TIMES (Feb. 5, 2025), <https://www.nytimes.com/2025/02/05/us/politics/trump-trans-athletes-executive-order.html>.

<sup>62</sup> Dorothy Hastings, *Trans soldiers served their country. Now the US is rolling back their healthcare*, THE GUARDIAN (Apr. 2, 2025), <https://www.theguardian.com/us-news/2025/apr/02/trans-soldiers-veterans-healthcare>.

<sup>63</sup> Jarrett Renshaw & David Shepardson, *Trump orders agencies to scrub 'gender ideology' from contracts, websites*, REUTERS (Jan. 29, 2025), <https://www.reuters.com/world/us/trump-orders-agencies-scrub-gender-ideology-contracts-websites-2025-01-30/>.

<sup>64</sup> Brooke Sopelsa, Jo Yurcaba & Katrina Lambert, *Trump signs executive order banning trans women from women's sports*, NBC NEWS (Feb. 5, 2025), <https://www.nbcnews.com/nbc-out/out-politics-and-policy/trump-executive-order-ban-trans-women-sports-rcna190767>.

<sup>65</sup> Tobi Raji, *Judge blocks Trump's orders to curb youth gender transition care*, WASH. POST (Mar. 1, 2025), <https://www.washingtonpost.com/nation/2025/03/01/judge-blocks-trumps-orders-curb-youth-gender-transition-care/>.

<sup>66</sup> Mariah Timms & Laura Kusisto, *Trump's Lightning-Speed Rollback of Transgender Rights Sparks Lawsuits*, WALL STREET JOURNAL (Feb. 5, 2025), <https://www.wsj.com/us-news/law/trumps-lightning-speed-rollback-of-transgender-rights-sparks-lawsuits-53f116a5>.

<sup>67</sup> Geoff Mulvihill & Jesse Bedayn, *Under the new Trump administration, this year's Transgender Day of Visibility has a different tenor*, AP NEWS (Mar. 31, 2025), <https://apnews.com/article/transgender-visibility-trump-orders-2f949cdab2673e3becdfc3d213158aa9>.

<sup>68</sup> Mike Wendling & Kayla Epstein, *Trump makes 'two sexes' official and scraps DEI policies*, BBC (Jan. 20, 2025), <https://www.bbc.com/news/articles/czx84en1yp4o>.

<sup>69</sup> Mattathias Schwartz, Amy Harmon, Shaila Dewan & Glenn Thrush, *Prison Officials Detail Treatment of Trans Inmates Under Trump Gender Order*, N.Y. TIMES (Feb. 21, 2025), <https://www.nytimes.com/2025/02/21/us/trump-trans-women-prison.html> (“Federal data show that transgender prisoners are 10 times as likely as other inmates to report being sexually abused”).

<sup>70</sup> American Civil Liberties Union, *Mapping Attacks on LGBTQ Rights in U.S. State Legislatures in 2025*, ACLU (Mar. 14, 2025), <https://www.aclu.org/legislative-attacks-on-lgbtq-rights-2025>.

and demonstrations,<sup>71</sup> including gatherings dedicated to educating LGBTQIA+ people on “survival skills” in the face of the continued curtailment of their legal rights.<sup>72</sup>

CCR is primarily engaged in disseminating information and is entitled to prompt and efficient responses to the request for information. This information will allow millions of LGBTQIA+ people who are waiting with bated breath to see what their lives will look like tomorrow to better prepare and plan for critical considerations, such as their continued access to life-saving healthcare. This will also better enable CCR, which regularly represents LGBTQIA+ clients, to advise its clients on their rights under the current law. Lastly, the expedient provision of this information will allow the American public to better understand the motivations and rationales behind the wholesale revocation of legal protections from a class of people.

## H. Preferred Format and Delivery

CCR requests that records be delivered via email to [REDACTED]. If the volume of responsive records is too large for email transmission, please provide them via a secure file-sharing service.

Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records. Please provide the requested documents in the following format:

- In PDF format wherever possible;
- Bates numbered in sequence for each agency;
- Without password protection;
- Electronically searchable wherever possible;
- “Parent-child” relationships maintained, meaning that the Requester must be able to identify the attachments with emails;
- Any data records in native format (i.e. Excel spreadsheets in Excel);
- Emails should include BCC and any other hidden fields; and
- With any other metadata preserved.

## Conclusion

If this Request is denied in whole or in part, CCR asks that each agency justify all its deletions by reference to specific exemptions of FOIA. CCR expects each agency to release all segregable portions of otherwise exempt material. Additionally, CCR reserves the right to appeal a decision to withhold any records or a decision to deny this application for expedited processing and fee waiver.

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<sup>71</sup> See, e.g., Alyce McFadden, Nell Gallogly & Wesley Parnell, *Amid Concern Over Trump Order, New Yorkers Rally to Support Trans Youth*, N.Y. TIMES (Feb. 8, 2025), <https://www.nytimes.com/2025/02/08/nyregion/nyc-trans-health-care-youth-protest.html>; Samantha Lim, *LGBTQ Activists Rally at Newsom’s Home, Demand Stronger Trans Rights Commitment*, KQED (Apr. 1, 2025), <https://www.kqed.org/news/12033818/lgbtq-activists-rally-at-newsoms-home-demand-stronger-trans-rights-commitment>; Sophie Rosenthal & Matt Gregory, *Trans Day of Visibility Rally comes to the National Mall Monday afternoon*, WUSA9 (Mar. 31, 2025), <https://www.wusa9.com/article/life/pride-matters/trans-day-of-visibility-rally-washington-dc/65-ad614a57-ee7f-4b3f-95d5-58eab843ce3c>.

<sup>72</sup> Nastia Voynovskaya, *Trans Folks to Share Survival Skills in the Tenderloin for Trans Day of Visibility*, KQED (Mar. 27, 2025), <https://www.kqed.org/arts/13973671/trans-day-of-visibility-san-francisco-tenderloin>.



I certify that everything in this FOIA request is true and correct. Thank you for your prompt attention to this request. We look forward to your response. If you require clarification or anticipate any delay, please contact us promptly at [REDACTED].

Sincerely,

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A. Chinyere Ezie  
Senior Staff Attorney  
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[REDACTED]