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Counsel for Plaintiff National Housing Law Project

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

NATIONAL HOUSING LAW PROJECT,

Plaintiff,

v.

U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT, U.S.
DEPARTMENT OF HOMELAND
SECURITY, and U.S. CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendants.

Case No. 3:26-cv-8909

**COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF**

1 Plaintiff National Housing Law Project (“NHLP”) brings this action against Defendant
2 U.S. Department of Housing and Urban Development (“HUD”) and two other agencies to
3 compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), to produce
4 records to shed light on data sharing between federal immigration agencies and HUD related to
5 the Systematic Alien Verification for Entitlements (“SAVE”) Program and participation in
6 HUD-assisted housing programs.

7 Plaintiff alleges as follows:

8 JURISDICTION, VENUE, AND DIVISIONAL ASSIGNMENT

9 1. This Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B)
10 and 28 U.S.C. § 1331.

11 2. Venue is proper under 5 U.S.C. § 552(a)(4)(B) because NHLP has its principal
12 place of business in San Francisco, California.

13 3. For the same reason, divisional assignment is proper in the San Francisco or
14 Oakland Division. *See* N.D. Cal. L.R. 3-2(c).

15 PARTIES

16 4. Plaintiff **National Housing Law Project (“NHLP”)** is a national nonprofit
17 organization incorporated under the laws of the State of California with its principal place of
18 business in San Francisco, California. NHLP was founded in 1968 and incorporated in 1978. Its
19 mission is to advance housing justice for marginalized communities by strengthening the rights
20 of tenants and low-income homeowners; increasing housing opportunities for underserved
21 communities; and preserving and expanding the supply of safe and affordable homes. NHLP
22 accomplishes its mission through publication of resources and technical assistance for the public
23 and housing professionals, public policy advocacy, and litigation in state and federal court.

24 5. Defendant **U.S. Department of Housing and Urban Development (“HUD”)** is
25 a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in
26 Washington, D.C. HUD has possession, custody, and control of records to which Plaintiff seeks
27 access.

6. Defendant **U.S. Department of Homeland Security (“DHS”)** is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. DHS has possession, custody, and control of records to which Plaintiff seeks access.

7. Defendant **U.S. Citizenship and Immigration Services (“USCIS”)** is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. USCIS is a component of DHS. USCIS has possession, custody, and control of records to which Plaintiff seeks access.

FACTUAL ALLEGATIONS

8. In January 2026, HUD began implementing immigrant-status verification policies, including requiring public housing authorities and owners to verify tenant eligibility within 30 days and take corrective action, if necessary, or face sanction and loss of funding.¹

9. Around the same time, HUD proposed a rule requiring the expanded use of USCIS’ SAVE Program by housing agencies and owners which could result in the denial or termination of housing assistance, placing thousands of families at risk of losing assistance and potentially facing eviction or family separation.²

HUD SAVE MOUs Request (26-FI-HQ-01723)

10. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-HUD-26-0581, to HUD seeking the following:

All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA) or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding the use of the Systematic Alien Verification for Entitlements (SAVE) Program, finalized between January 20, 2025, and the date of search.

¹ U.S. Dep’t of Hous. & Urb. Dev., *HUD No. 26-008* (Jan. 2026), <https://perma.cc/YZ2D-XPBK>.

² Housing and Community Development Act of 1980: Verification of Eligible Status, 91 Fed. Reg. 8151 (proposed Feb. 20, 2026) (to be codified at 24 C.F.R. pt. 5); *see also* Sonya Acosta, *HUD Publishes Proposed Rule that Would Take Away Rental Assistance, Create New Barriers*, Ctr. on Bdgt. and Pol’y Priorities (Feb. 2026), <https://www.cbpp.org/research/federal-budget/executive-action-watch?item=30507>.

11. This request sought expedited processing under 12 C.F.R. § 1070.17(b)(ii), citing an urgent need to inform the public concerning actual or alleged federal government activity.

12. On May 7, 2026, HUD acknowledged this request and assigned it tracking number 26-FI-HQ-01723. In the same letter, HUD denied NHLP's request for expedited processing and assigned the request to the complex track.

13. On May 14, 2026, NHLP appealed the denial of the request for expedited processing, and asked HUD to reverse that denial. NHLP stated that the ways in which it regularly disseminates information nationally, including through publications, trainings, and technical assistance concerning federal housing policy and tenants' rights. It further explained that there was an urgency to inform the public because HUD had already begun implementing interagency data sharing; the scope of such agreements might affect tenants and applicants for housing benefits across the country; and if the public learned about the terms only after the decisions had been finalized, the information would be less useful for public oversight and accountability.

14. On June 10, 2026, HUD affirmed the denial of expedited processing.

15. NHLP has not received a determination or any responsive records in response to the FOIA request.

HUD Data Sharing MOUs Request (26-FI-HQ-01724)

16. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-HUD-26-0582, to DHS seeking the following:

1. All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA), computer matching agreements, or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding data sharing or collaboration, finalized between January 20, 2025, and the date of search.
2. All records reflecting any requests for data sent between HUD and the U.S. Department of Homeland Security or any of its components, including all requests, responses, and related communications; and
3. All records reflecting instructions or technical specifications for any transfer of data between HUD and the U.S. Department of Homeland Security or any of its components that includes data about participants in HUD-assisted housing programs including but not limited to participants

in public housing (42 U.S.C. 1437), participants in project-based rental assistance (42 U.S.C. 1437f), and participants in the Section 8 Housing Choice Voucher program (42 U.S.C. 1437f(o)), including but not limited to any transfer of data in connection with the “collaboration” identified in HUD’s FY 2025 Agency Financial Report³ [footnote in submitted request] or with the production of the “EIV-SAVE Tenant Matching Reports” referenced in HUD’s January 23, 2026, letter to Public Housing Agencies (PHAs).⁴ [footnote in submitted request]

17. This request sought records from January 20, 2025, through the date of the search.

18. On April 30, 2026, HUD acknowledged this request, assigned it tracking number 26-FI-HQ-01724, and stated that the request would be processed in the complex track.

19. On May 22, 2026, NHLP sent HUD a letter, advising that the request concerned a matter of significant public concern, and asked that HUD commit to initiating rolling productions beginning on June 5, 2026.

20. NHLP has not received a determination or any responsive records in response to the FOIA request.

DHS MOU Requests (2026-HQFO-02879)

21. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-MULTI-DHS-26-0572, to DHS seeking the following:

All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA) or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding the use of the Systematic Alien Verification for Entitlements (SAVE) Program, finalized between January 20, 2025, and the date of search.

22. On April 29, 2026, DHS acknowledged this request and assigned it tracking number 2026-HQFO-02590. DHS further stated that it was administratively closing the request because any responsive records would be responsive under another FOIA request (2026-HQFO-02591, *see infra* ¶ 25) and thus was a duplicate.

³ For further identifying information, *see* U.S. Dep’t of Hous. & Urb. Dev., *Agency Financial Report: Fiscal Year 2025* at 173 (2025),

<https://www.hud.gov/sites/dfiles/CFO/documents/afr2025.pdf>.

⁴ For further identifying information, *see* U.S. Dep’t of Hous. & Urb. Dev., *Letter to Public Housing Agency Executive Directors on Citizenship and Immigration Status Verification*, <https://www.hud.gov/sites/default/files/PIH/documents/PHA-Letter-on-EIV-Report.pdf>.

23. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-MULTI-DHS-26-0575, to DHS seeking the following:

1. All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA), computer matching agreements, or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding data sharing or collaboration, finalized between January 20, 2025, and the date of search.

2. All records reflecting any requests for data sent between HUD and the U.S. Department of Homeland Security or any of its components, including all requests, responses, and related communications; and

3. All records reflecting instructions or technical specifications for any transfer of data between HUD and the U.S. Department of Homeland Security or any of its components that includes data about participants in HUD-assisted housing programs including but not limited to participants in public housing (42 U.S.C. 1437), participants in project-based rental assistance (42 U.S.C. 1437f), and participants in the Section 8 Housing Choice Voucher program (42 U.S.C. 1437f(o)), including but not limited to any transfer of data in connection with the “collaboration” identified in HUD’s FY 2025 Agency Financial Report or with the production of the “EIV-SAVE Tenant Matching Reports” referenced in HUD’s January 23, 2026, letter to Public Housing Agencies (PHAs).

24. This request sought records from January 20, 2025, through the date of the search.

25. On April 29, 2026, DHS acknowledged this request and assigned it tracking number 2026-HQFO-02591.

26. The next day, DHS stated that it was unable to locate any responsive records and closed the request.

27. On May 8, 2026, NHLP appealed the final determinations of both 2026-HQFO-02590 and 2026-HQFO-02591, stating that public reporting belied DHS’ position that no records existed that would be responsive to NHLP’s requests.

28. On May 28, 2026, DHS acknowledged receipt of the appeal, assigned it tracking number 2026-HQAP-0053, and stated that the consolidated requests were assigned tracking number 2026-HQFO-02879. In response to NHLP’s appeal, DHS remanded to the DHS Privacy Office for further actions.

29. NHLP has not received a determination or any responsive records in response to the FOIA requests.

USCIS SAVE MOUs Request (COW2026005167)

30. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-MULTI-DHS-USCIS-26-0574, to USCIS seeking the following:

All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA) or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding the use of the Systematic Alien Verification for Entitlements (SAVE) Program, finalized between January 20, 2025, and the date of search.

31. On June 2, 2026, USCIS acknowledged this request, assigned it tracking number COW2026005167, and placed it in the complex track.

32. NHLP has not received a determination or any responsive records in response to the FOIA request.

USCIS Data Sharing MOUs Request (COW2026005168)

33. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-MULTI-DHS-USCIS-26-0577, to USCIS seeking the following:

1. All Memoranda of Understanding (MOU), Memoranda of Agreement (MOA), computer matching agreements, or other inter-or intra-agency agreements between HUD and the U.S. Department of Homeland Security or any of its components regarding data sharing or collaboration, finalized between January 20, 2025, and the date of search.

2. All records reflecting any requests for data sent between HUD and the U.S. Department of Homeland Security or any of its components, including all requests, responses, and related communications; and

3. All records reflecting instructions or technical specifications for any transfer of data between HUD and the U.S. Department of Homeland Security or any of its components that includes data about participants in HUD-assisted housing programs including but not limited to participants in public housing (42 U.S.C. 1437), participants in project-based rental assistance (42 U.S.C. 1437f), and participants in the Section 8 Housing Choice Voucher program (42 U.S.C. 1437f(o)), including but not limited to any transfer of data in connection with the “collaboration” identified in HUD’s FY 2025 Agency Financial Report ⁵ [footnote in submitted request] or with the production of the “EIV-SAVE Tenant Matching Reports” referenced in HUD’s January 23, 2026, letter to Public Housing

⁵ For further identifying information, see U.S. Dep’t of Hous. & Urb. Dev., *Agency Financial Report: Fiscal Year 2025* at 173 (2025),

<https://www.hud.gov/sites/dfiles/CFO/documents/afr2025.pdf>.

Agencies (PHAs).⁶ [footnote in submitted request]

34. This request sought records from January 20, 2025, through the date of the search.

35. On May 22, 2026, NHLP sent USCIS a letter (the “May 22 letter”), advising that the request concerned a matter of significant public concern, and asked that USCIS commit to initiating rolling productions beginning on June 5, 2026.

36. On June 2, 2026, USCIS acknowledged this request, assigned it tracking number COW2026005168, and placed it in the simple track.

37. On June 8, 2026, Democracy Forward Foundation, on behalf of NHLP, requested confirmation that USCIS received the May 22 letter.

38. On June 11, 2026, USCIS confirmed receipt of the May 22 letter and stated that NHLP’s request was number 362 of 368 pending FOIA requests in the simple track.

39. NHLP has not received a determination or any responsive records in response to the FOIA request.

HUD Communications Request (26-FI-HQ-01725)

40. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-HUD-26-0583, to HUD seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Signal, WhatsApp, Slack and Microsoft Teams, and direct messages on social media platforms such as X and Truth Social) between (a) the HUD officials listed below and (b) anyone communicating on behalf of the U.S. Department of Homeland Security or any of its components, including email addresses ending in dhs.gov, that (c) concern the “collaboration” identified in HUD’s FY 2025 Agency Financial Report.⁷ [footnote in submitted request]

HUD Officials

1. Benjamin Hobbs, Assistant Secretary for Public and Indian Housing

⁶ For further identifying information, see U.S. Dep’t of Hous. & Urb. Dev., *Letter to Public Housing Agency Executive Directors on Citizenship and Immigration Status Verification*, <https://www.hud.gov/sites/default/files/PIH/documents/PHA-Letter-on-EIV-Report.pdf>.

⁷ For further identifying information, see U.S. Dep’t of Hous. & Urb. Dev., *Agency Financial Report: Fiscal Year 2025* at 173 (2025), <https://www.hud.gov/sites/dfiles/CFO/documents/afr2025.pdf>.

2. Heidi J. Frechette, General Deputy Assistant Secretary for Public and Indian Housing
3. Anyone serving in the capacity of the Director of Public Housing Programs
4. Anyone serving in the capacity of Assistant Secretary for Policy Development and Research
5. John Gibbs, Principal Deputy Assistant Secretary for Policy Development and Research
6. Frank Cassidy, Assistant Secretary for Housing
7. Anyone serving in the capacity of Deputy Assistant Secretary of Multifamily Housing
8. The designated point of contact between HUD and DHS identified in a Memorandum of Understanding signed by Secretaries Kristi Noem and Scott Turner⁸ [footnote in submitted request]

41. This request sought records from January 20, 2025, through the date of the search.

42. On April 28, 2026, HUD sent an auto-acknowledgment, stating that it assigned the request tracking number 26-FI-HQ-01725.

43. On April 30, 2026, HUD sent a letter acknowledging the request and stated that it was considering the fee waiver request.

44. NHLP has not received a determination or any responsive records in response to the FOIA request.

DHS & USCIS Communications Requests (2026-HQFO-02592, COW2026004349)

45. On April 28, 2026, NHLP sent FOIA requests, bearing internal tracking numbers NHLP-DFF-MULTI-DHS-26-0578 and NHLP-DFF-MULTI-DHS-USCIS-26-0580, respectively, to both DHS and USCIS seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Signal, WhatsApp, Slack and Microsoft Teams, and direct messages on social media platforms such as X and Truth Social) between (a) the DHS officials listed below and (b) anyone communicating on behalf of the U.S. Department of Housing and Urban Development or any of its components, including email addresses ending in hud.gov, that (c) concern the “collaboration” identified in HUD’s FY 2025 Agency

⁸ For further identifying information, see Memorandum of Understanding Between the U.S. Department of Homeland Security and the U.S. Department of Housing and Urban Development (Mar. 24, 2025), <https://www.hud.gov/sites/default/files/PA/documents/DHS-HUD-MOU-032425.pdf>.

Financial Report.⁹ [footnote in submitted request]

DHS Officials

1. Antoine McCord, Chief Information Officer
2. James Percival, General Counsel
3. Patrick Farrell, Assistant Secretary, Office of Intergovernmental Affairs (acting), Angelica Alfonso-Royals, Chief Operating Officer, U.S. Citizenship and Immigration Services
4. Randy Blair, Acting Chief Counsel, Office of Chief Counsel
5. Connie Nolan, Acting Associate Director, Management Directorate
6. Larry C. DeNayer, Acting Associate Director, Immigration Records and Identity Services Directorate
7. Susan C. Dunbar, Executive Associate Director, Management and Administration
8. Andrew Davidson, Acting Associate Director of the Fraud Detection and National Security Directorate
9. The designated point of contact between HUD and DHS identified in a Memorandum of Understanding signed by Secretaries Kristi Noem and Scott Turner¹⁰ [footnote in submitted request]

46. This request sought records from January 20, 2025, through the date of the search.

47. On April 29, 2026, DHS acknowledged the request that was sent to the DHS Privacy Office, and assigned it tracking number 2026-HQFO-02592.

48. On May 12, 2026, NHLP received a letter from USCIS, dated May 5, 2026, which stated that DHS had partially referred requested number 2026-HQFO-02592 to USCIS. USCIS acknowledged receipt of the FOIA request and assigned it tracking number COW2026004349.

49. On June 4, 2026, NHLP received another letter from USCIS, acknowledging receipt of the FOIA request that was sent directly to USCIS, and assigning it tracking number COW2026005188. It further stated that USCIS was already processing the request under COW2026004349 and thus no further action would be taken on COW2026005188.

50. NHLP has not received a determination or any responsive records in response to either FOIA request from either DHS or USCIS.

⁹ For further identifying information, see U.S. Dep't of Hous. & Urb. Dev., *Agency Financial Report: Fiscal Year 2025* at 173 (2025), <https://www.hud.gov/sites/dfiles/CFO/documents/afr2025.pdf>.

¹⁰

HUD Participant Verification Request (26-FI-HQ-01726)

51. On April 28, 2026, NHLP sent a FOIA request, bearing internal tracking number NHLP-DFF-HUD-26-0584, to HUD seeking the following:

1. All final guidance, directives, instructions, or related documentation issued in relation to the “collaboration” identified in HUD’s FY 2025 Agency Financial Report, including but not limited to including any documentation of the decision to undertake it and any written report of the results;
2. Policies and procedures governing the maintenance, use, or sharing of data regarding participants in HUD-assisted housing programs including but not limited to participants in public housing (42 U.S.C. 1437), participants in project-based rental assistance (42 U.S.C. 1437f), and participants in the Section 8 Housing Choice Voucher program (42 U.S.C. 1437f(o)), including but not limited to policies and procedures governing the data stored in the Inventory Management System/PIH Information Center (“IMS/PIC”) system and the data supplied on Form 50058 (Tenant ID Management).

Parts 1 and 2 of this request seek records from January 20, 2025 until the date of the search.

3. All records reflecting communications between HUD and public housing authorities (PHAs) and HUD and project-based contract administrators (PBCAs) and owners of HUD multifamily housing since December 1, 2025 regarding verification of citizenship, nationality, and eligible immigration status for recipients of public housing benefits or the “EIV-SAVE Tenant Matching Reports.”

For part 3 of this request, HUD is best positioned to determine which specific offices, divisions, or components may possess records responsive to this request. However, a search should include, at minimum, the Office of Public and Indian Housing, the Real Estate Assessment Center, the Office of General Counsel, the Office of Policy Development and Research, the Office of Housing, and the Office of Multifamily Housing.

52. On April 28, 2026, HUD sent an auto-acknowledgment, stating that it assigned the request tracking number 26-FI-HQ-01726.

53. On April 30, 2026, HUD sent a letter acknowledging the request. It stated that unusual circumstances applied and thus the request might take beyond 30 days to process, that it was processing the request on the complex track, and that it was considering the fee waiver.

54. NHLP has not received a determination or any responsive records in response to the FOIA request.

Exhaustion of Administrative Remedies

55. As of the date of the Complaint, Defendants have failed to notify NHLP of determinations regarding NHLP's requests.

56. In addition, through Defendant HUD's failure to grant expedited processing as to the HUD SAVE MOUs Request, *see supra* at 2–3, NHLP has exhausted administrative remedies and that failure is subject to judicial review.

CLAIMS FOR RELIEF

Count 1 (Violation of FOIA, 5 U.S.C. § 552, Failure to Issue Determinations and Release any Responsive, Non-Exempt Records)
(All Defendants)

57. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

58. By failing to respond to Plaintiff's requests with determinations and prompt productions of responsive records within the statutorily mandated time period, Defendants have violated their duties under 5 U.S.C. § 552, including, but not limited to, their duties to conduct a reasonable search for responsive records, to take reasonable steps to release all non-exempt information, and to not withhold non-exempt portions of responsive records.

Count 2 (Violation of FOIA, 5 U.S.C. § 552, Failure to Grant Expedited Processing)
(HUD only)

59. Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

60. By failing to grant Plaintiff's request for expedited processing as to the HUD SAVE MOUs Request, Defendant HUD has violated FOIA. 5 U.S.C. § 552(a)(6)(E)(iii).

REQUEST FOR RELIEF

WHEREFORE, Plaintiff requests that this Court:

- a. Order Defendants to conduct searches for any and all responsive records to Plaintiff's FOIA requests using search methods reasonably calculated to lead to discovery of all responsive records;
- b. Order Defendant HUD to grant Plaintiff's request for expedited processing as to the

HUD SAVE MOUs Request and to process that request on an expedited basis by providing Plaintiff, as soon as practicable, with a determination and non-exempt portions of the requested records by producing those records within seven days of the Court's order;

- c. Order Defendants to produce, by a date certain, any and all non-exempt responsive records and a *Vaughn* index of any responsive records withheld under a claim of exemption;
- d. Enjoin Defendants from continuing to withhold any and all non-exempt responsive records;
- e. Award Plaintiff its costs, attorney's fees, and other disbursements for this action; and
- f. Grant any other relief this Court deems appropriate.

Dated: August 26, 2026

Respectfully submitted,

/s/ Deborah Thrope

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