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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

SAN FRANCISCO AIDS FOUNDATION;
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
 as President of the United States; *et al.,*

Defendants.

Case No. 4:25-cv-01824-JST

**SUPPLEMENTAL DECLARATION OF
 ROBERTO ORDEÑANA, EXECUTIVE
 DIRECTOR OF THE GLBT
 HISTORICAL SOCIETY, IN SUPPORT
 OF PLAINTIFFS' MOTION FOR
 PRELIMINARY INJUNCTION**

1 I, Roberto Ordeñana, hereby state as follows:

2 1. I am the Executive Director at the GLBT Historical Society. I have personal
3 knowledge of the facts stated herein and, if called upon, could competently testify thereto.

4 2. I submit this declaration to inform the Court of the termination of a grant previously
5 awarded to GLBT Historical Society by the National Endowment for the Humanities (“NEH”).

6 3. On August 26, 2024, GLBT Historical Society received approval from NEH for a
7 grant of \$10,000 under Federal Award ID Number PG-300781-24 as part of the American Tapestry
8 initiative.

9 4. The American Tapestry initiative leverages the humanities to strengthen
10 democracy, advance equity, address climate change, and specifically aims to preserve our cultural
11 inheritance. This initiative emphasizes equity by supporting projects that ensure diverse historical
12 narratives are preserved and accessible, enhancing public education and understanding of
13 historically marginalized communities.¹

14 5. The grant was specifically intended to support the purchase, shipping, and
15 installation of preservation furniture for the storage and preservation of approximately 1,500 rare
16 and unique LGBTQ archival posters within GLBT Historical Society’s Dr. John P. De Cecco
17 Archives and Special Collections.

18 6. These posters represent critical visual and documentary evidence of LGBTQ
19 community engagement with the cultural, political, and social dynamics of Northern California.
20 They provide essential documentation of marginalized queer communities whose historical
21 contributions and experiences are frequently overlooked or lost. Thus, preserving these materials
22 directly supports the grant’s objectives to preserve our cultural inheritance and advance equity for
23 all.

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27 ¹ <https://www.neh.gov/news/american-tapestry-weaving-together-past-present-and-future>

1 7. The GLBT Historical Society applied for this grant on January 11, 2024, detailing
2 the project's alignment with NEH's preservation and equity goals. On August 26, 2024, NEH
3 formally approved the grant. A copy of the Notice of Award is attached hereto as **Exhibit A**.

4 8. The preservation initiative was recommended by professional assessments to
5 prevent damage from potential environmental risks, thus safeguarding irreplaceable historical
6 records essential for researchers, scholars, educators, artists, and the broader public. The GLBT
7 Historical Society uses these archival collections extensively in exhibits, educational programs,
8 and public outreach, significantly contributing to community awareness and understanding of
9 LGBTQ history and experiences, consistent with the American Tapestry's goals of cultural
10 preservation and advancing equity.

11 9. Despite initial approval and our reliance on such, on April 2, 2025, NEH terminated
12 the grant effective immediately. A copy of the termination notice is attached hereto as **Exhibit B**.

13 10. This termination significantly impacts our capacity to preserve critical historical
14 materials and undermines our commitment to equitable access to LGBTQ historical narratives,
15 including crucial elements of transgender history.

16 11. We still do not understand why the grant was terminated. Our grant application was
17 clearly within the stated purposes of the American Tapestry initiative. While the termination letter
18 cites to an executive order that purportedly mandates that the NEH eliminate all non-statutorily
19 required activities and functions, the law that lead to the creation of the NEH states that, "It is vital
20 to democracy to honor and preserve its multicultural artistic heritage as well as support new ideas,
21 and therefore it is essential to provide financial assistance to its artists and the organizations that
22 support their work." A printout of the NEH webpage for the National Foundation on the Arts and
23 the Humanities Act of 1965 (P.L. 89-209) is attached hereto as **Exhibit C**.

24 12. What is more, the termination letter includes language that is very disconnected
25 from the stated program purpose, including vague justifications such as "new direction in
26 furtherance of the President's agenda," "termination is necessary to safeguard the interests of the
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1 federal government," "represents an urgent priority," and references to "exceptional
2 circumstances." The language used suggests urgency and a threat to the government's interests but
3 provides no meaningful explanation or rationale for why the grant poses such an immediate
4 concern.

5 13. Given the above, on April 4, 2025, we reached out to the NEH for further
6 explanation about the termination; what our ongoing obligations under the grant are, if any; and
7 how, if at all, we would be able to recoup expenses already incurred in connection with the grant.
8 On April 7, 2025 we received a response that "no further information is available at this time" and
9 to "refer to the termination notice from the Acting Chair for information." A copy of the inquiry
10 to the NEH is attached hereto as **Exhibit D**.

11 14. Regardless of this termination, we intend to continue to apply and compete for NEH
12 grant funding opportunities that align with and help us fulfill our mission. However, pursuant to
13 the Gender Order and the DEI-1 and DEI-2 Orders, the NEH has added guidance to its Notices of
14 Funding Opportunities (NOFOs) restricting such funding opportunities from the "promotion of
15 gender ideology," "environmental justice initiatives or activities," "discriminatory equity
16 ideology," and DEI/DEIA. A printout of the NEH webpage titled "NEH Implementation of Recent
17 Executive Orders," last updated March 20, 2025, is attached hereto as **Exhibit E**.

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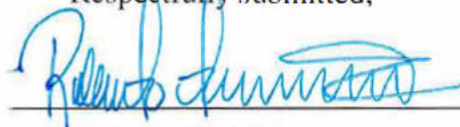
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2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct.

4 Dated: April 7, 2025

Respectfully submitted,

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7 Roberto Ordeñana
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