

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

ETHICAL SOCIETY OF POLICE; NAACP  
ST. LOUIS COUNTY; MISSIONARY  
BAPTIST STATE CONVENTION OF  
MISSOURI; TWO WRASSLIN' CATS  
ACCORD; OUT ACCOUNTABILITY  
PROJECT; BERKSHIRE RESOURCES FOR  
INTEGRATION OF DIVERSE GROUPS  
AND EDUCATION; NAACP STATE  
CONFERENCE COLORADO-MONTANA-  
WYOMING; PEACEMAKERS LODGE;  
PIKES PEAK SOUTHERN CHRISTIAN  
LEADERSHIP CONFERENCE 1;  
WELLSPRING HEALTH ACCESS; and  
HAITIAN COMMUNITY HELP & SUPPORT  
CENTER,

*Plaintiffs,*

v.

PAMELA J. BONDI, in her official capacity  
as Attorney General of the United States; and  
U.S. DEPARTMENT OF JUSTICE,

*Defendants.*

Case No. 25-CV-\_\_

**MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiffs Ethical Society of Police, NAACP St. Louis County, Missionary Baptist State Convention of Missouri, Two Wrasslin' Cats Accord, Out Accountability Project, Berkshire Resources for Integration of Diverse Groups and Education ("BRIDGE"), NAACP State Conference Colorado-Montana-Wyoming, Peacemakers Lodge, Pikes Peak Southern Christian Leadership Conference 1, Wellspring Health Access, and Haitian Community Help & Support Center hereby respectfully move, pursuant to Fed. R. Civ. P. 65 and D. Mass. L.R. 7.1, for a Temporary Restraining Order on an emergency basis to enjoin Defendants from implementing their decision to "eliminate the Community Relations Service (CRS) and its functions," as

memorialized in the Office of Management and Budget’s Technical Supplement to the President’s FY 2026 budget request and in the Department of Justice’s FY 2026 Budget and Performance Summary dated June 13, 2025. To prevent irreparable harm to Plaintiffs, this includes temporary restraint of the Reduction in Force (“RIF”) of CRS employees scheduled to become effective on October 31, 2025, which Defendants are explicitly undertaking in furtherance of their unlawful decision to dissolve CRS. The elimination and dissolution of CRS, including through the scheduled RIF, will take final effect **Friday, October 31, 2025**.

As set forth in detail in the accompanying Memorandum of Law (including numerous declarations submitted therewith), Plaintiffs have established that (i) they are likely to succeed on their claims under the Administrative Procedure Act and U.S. Constitution; (ii) they will suffer irreparable harm without a Temporary Restraining Order (“TRO”); and (iii) the interests of the public and the balance of the equities weigh heavily in favor a TRO to preserve the status quo.

WHEREFORE, Plaintiffs respectfully request that the Court immediately enter a TRO to enjoin Defendants, together with their employees, agents, and anyone acting in concert with them, from (i) enforcing or implementing the decision to “eliminate the Community Relations Service (CRS) and its functions,” as memorialized in the Office of Management and Budget’s Technical Supplement to the President’s FY 2026 budget request and in the Department of Justice’s FY 2026 Budget and Performance Summary dated June 13, 2025; (ii) enforcing or implementing the Reduction in Force (“RIF”) of CRS employees scheduled to go into effect on October 31, 2025; (iii) taking any action to eliminate, dissolve, or otherwise dismantle CRS or its functions; and (iv) terminating the CRS employees subject to the above-referenced RIF.

A proposed Temporary Restraining Order is submitted herewith.

Dated: October 24, 2025

Respectfully Submitted,

/s/ Ana Muñoz  
Ana Muñoz  
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*Counsel for Plaintiffs*

*\* Application for pro hac vice forthcoming*

October 24, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon all attorneys of record by electronic filing on the above date.

/s/ Ana Muñoz  
Ana Muñoz

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 37.1**

I, Kyle R. Freeny, certify that on October 24, 2025, I contacted the following individuals at the U.S. Department of Justice by electronic mail to provide notice of this motion:

Eric J. Hamilton  
Deputy Assistant Attorney General, Federal Programs Branch  
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Plaintiffs have not yet had an opportunity to meet and confer with Defendants' counsel, who has not yet appeared in this case, but are proceeding with this filing given the need for prompt relief, as set forth in Plaintiffs' Motion for Temporary Restraining Order and accompanying papers.

*/s/ Kyle R. Freeny*  
Kyle R. Freeny