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**Appearance Pro Hac Vice*

Counsel for Plaintiffs

14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **OAKLAND DIVISION**

16 SAN FRANCISCO AIDS FOUNDATION, et
17 al.;

Plaintiffs,

19 v.

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

Defendants.

Case No. 4:25-cv-1824-JTS

**DECLARATION OF IYA DAMMONS
OF BALTIMORE SAFE HAVEN CORP
IN SUPPORT OF PLAINTIFF'S
COMPLAINT AND MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Iya Dammons, hereby state as follows:

2 1. I am the Founder & Executive Director of Baltimore Safe Haven Corp (“BSH”), a
3 not-for-profit 501(c)(3) organization based in Baltimore, Maryland. BSH is rooted in its mission
4 to empower transgender, lesbian, gay, bisexual, queer, intersex, and asexual (“TLGBQIA+”)
5 individuals in Baltimore who are navigating survival modes by providing inclusive and
6 supportive spaces, resources, and opportunities. Our mission is to foster an environment where
7 every member of the TLGBQIA+ community not only survives but thrives, promoting resilience,
8 dignity, and inclusivity as we collectively work towards a more compassionate and equitable
9 Baltimore.
10

11 2. I submit this Declaration in support of Plaintiffs’ Complaint and Motion for a
12 Preliminary Injunction, which seek to prevent Defendant agencies and their leadership from
13 enforcing Executive Order No. 14168 “Defending Women From Gender Ideology Extremism
14 and Restoring Biological Truth to the Federal Government,” issued January 20, 2025; Executive
15 Order No. 14151 “Ending Radical and Wasteful DEI Programs and Preferencing,” issued
16 January 20, 2025; and Executive Order No. 14173 “Ending Illegal Discrimination and Restoring
17 Merit-Based Opportunity,” issued January 21, 2025 (collectively, the “Executive Orders”), and
18 related agency directives that seek to enforce illegal, *ultra vires* Presidential action.
19

20 3. BSH was founded in 2018 with a visionary mission: to forge a supportive community
21 and essential resource for TLGBQIA+ individuals, especially focusing on Black transgender
22 women navigating survival mode living. As someone with lived experience, I founded BSH as a
23 mutual aid organization focused on providing life-saving support for survival sex workers and
24 other marginalized TLGBQIA+ individuals. Our work began with a comprehensive wellness and
25 outreach program, meeting people where they were—on the stroll, in encampments, and in
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1 overlooked parts of the city—providing safer sex education, overdose prevention tools, and peer
2 support.

3 4. Within a year, BSH was granted 501(c)(3) status and was able to begin applying for
4 grant funding to expand our mission. We received \$100,000 in pass-through grant funding from
5 the Substance Abuse and Mental Health Services Administration (“SAMHSA”) via the
6 Maryland Department of Health and used it to advance our mobile outreach work and open a
7 brick-and-mortar drop-in center. There we could provide hot meals, showers, laundry services, and
8 case management, as well as a safe, affirming environment where people could rest, connect
9 with peers, and access harm reduction services related to substance use. Over time our drop-in
10 center has expanded its services to include behavioral health coordination and crisis intervention,
11 integrated physical health services including HIV testing and sexual health care, workforce
12 support, and legal support.

14 5. Our mobile outreach programs continue to this day, including weekly overnight
15 mobile outreach on Fridays and Saturdays to high-risk areas, providing basic needs and survival
16 support; health and harm reduction services such as sterile syringes, naloxone kits, safe sex
17 supplies, HIV testing and linkage to other medical care services; and peer support and navigation
18 to TLGBQIA+ community members in need.

20 6. In 2020, BSH launched our first housing program—an emergency and transitional
21 housing program aimed at underserved youth aged 18–24. This work was supported by pass-
22 through Housing and Urban Development (“HUD”) grants from the Maryland Department of
23 Health and the Mayor’s Office of Homelessness Services through the City of Baltimore. Since
24 then, we have expanded our housing supports significantly, providing homelessness prevention
25 services aimed at assisting TLGBQIA+ individuals at risk of homelessness, emergency and
26

1 transitional housing, permanent supportive housing for older adults, housing placement
2 assistance, and housing stability support.

3 7. BSH also provides extensive community programming, fostering cultural resilience,
4 advocacy, and peer support through community-driven initiatives. This includes a Ballroom Arts
5 & Health Initiative integrating Black TLGBQIA+ ballroom culture with health and wellness
6 resources; quarterly community Events focusing on advocacy, wellness, and celebration of
7 TLGBQIA+ resilience; Baltimore Trans Pride, an advocacy march and resource block party with
8 30+ local TLGBQIA+ supportive organizations; safe spaces for mental health support, shared
9 experiences, and collective healing; and programs tailored for aging TLGBQIA+ individuals,
10 ensuring safe, affirming housing and community connections.
11

12 8. Currently, approximately 80% of BSH's budget comes from federal grant money. In
13 2024, we launched a capital campaign to establish BSH's first permanent home—the Safe Haven
14 Campus, a one-stop TLGBQIA+ housing and resource center, bringing together housing, harm
15 reduction, healthcare, workforce development, and community-building initiatives under one
16 roof. Congressman Kweisi Mfume secured an appropriation of \$1 million of HUD Community
17 Development funding to help us purchase the building, which was supposed to become available
18 to us shortly after the beginning of the year. We had completed the purchase of the building on
19 December 31, 2024 and uploaded all of the required documents to the HUD portal for drawing
20 down federal funding. Soon after the Executive Orders issued, we were receiving notifications
21 that the funding was available to us and had been deposited into our account, but it was not. We
22 became very concerned that the funding was being held up because of the Executive Orders'
23 restrictions on BSH's core work. We could not get a hold of any HUD staff member who could
24 provide us with any insight. Finally, on February 18, 2025, the money was deposited into our
25 account.
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1 9. BSH also receives approximately \$3 million in operating funds via federal grant
2 money, whether directly or as a subgrantee. These include the following for 2025 as part of
3 multi-year agreements:

4 a. We receive two grants of HUD dollars from the Mayor’s Office of
5 Homeless Services through the City of Baltimore. The first is for \$239,000 in funding
6 from the HUD Youth Homelessness Demonstration Project to fund our transitional
7 housing program for 18–24-year-olds. The second is for \$751,000 in funding from
8 HUD’s Continuum of Care Program’s Transitional Housing/Rapid Rehousing component
9 to fund our transitional housing and rental assistance programs.
10

11 b. We receive a \$182,000 grant of funding from the Centers for Disease
12 Control and Prevention (“CDC”) via the Baltimore City Health Department (“BCHD”).
13 The funding was provided to the BCHD through the CDC’s High Impact HIV and
14 Surveillance Programs for Health Departments, part of the CDC’s longstanding “Ending
15 the HIV Epidemic” initiative. When the BCHD issued its request for proposals from
16 subgrantees, it specifically invited proposals for HIV-prevention programs with a focus
17 on transgender people in the zip codes BSH most regularly serves.
18

19 c. We receive a \$630,000 grant of SAMHSA funds through the Maryland
20 Department of Health to support our harm reduction efforts, with a focus towards
21 preventing overdoses and HIV transmission. While the Department’s RFP for this grant
22 was more generally about optimizing services for people who use drugs, BSH’s proposal
23 focused on expanding harm reduction efforts to TLGBQIA+ individuals living in survival
24 mode in Baltimore.
25

26 10. The Executive Orders threaten this funding. Respecting transgender people and
27 advancing our civil rights is central to BSH’s identity, advocacy, and mission, and a necessary
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1 part of every aspect of the services we provide. BSH's origin as an organization created by
2 transgender people for transgender people makes it imperative that we not only fight injustices
3 against transgender people but provide our services to our community in a culturally competent
4 way. It is the cornerstone of our identity.

5 11. Even though we serve everyone, we are a trans-led organization and being forced
6 to hide or diminish that part of our identity would harm both us and our clients. It would harm
7 us because we are unique in that we are Baltimore's only trans-led drop-in wellness center. And
8 it would also harm our clients by eroding their trust in us, since many clients turn to us
9 specifically because of our trans-centered background and approach. Being forced to abandon
10 that focus would turn us into just another agency that does not serve the transgender community,
11 leaving no one to ensure that the multiply marginalized transgender people we serve have access
12 to basic necessities—housing, food, and the ability to survive. It would diminish our community
13 and our leadership.

14
15 12. BSH takes an equitable approach to providing services, focusing our resources on
16 underserved communities and, in fact, many of our grants require us to take this approach. Our
17 programming purposely centers around Black transgender women, recognizing that this
18 population experiences the most significant barriers created by racism, homophobia, transphobia,
19 and sexism. Our staff's work is rooted in their own lived experience and in peer-led initiatives
20 because there is no substitute for having walked the walk and experienced things and come out
21 on the other side. Understanding of the system is what allows community-led solutions to come
22 through. The Executive Orders would require us to ignore that Black transgender women do not
23 have the same access to healthcare, housing, or economic mobility—every measure of health and
24 wellness. Not only would this do tremendous harm to the TLGBQIA+ people who look to us for
25 care and support, but we would lose the ability to identify other marginalized populations in need
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1 of the same supports and services, such as cisgender women engaging in survival sex work and
2 aging populations.

3 13. BSH is an example of what DEI should be; not words or a job title, but having the
4 power to make decision, provide solutions, and work with others to make chances and advocate
5 in different spaces. For example, we share spaces with BLM, reproductive and bodily autonomy
6 groups, and criminal justice reform groups. Simply put, DEI is our ethos.

7 14. The Executive Orders will have a disastrous effect on BSH's work because it will
8 stop our funding. There is simply no way to do our work and fulfill our mission in a way that
9 does not directly center the experiences of marginalized TLGBQIA+ people. The Executive
10 Orders attempt to erase even the word that describes who our people are and interrupt critical
11 initiatives and services solely because they are being provided to certain underserved
12 communities. Their goal is to get rid of us on every front and to take away the progress we have
13 made, even if it harms the general community. Ultimately, they will cause our clients to
14 die—either through self-harm, murder, untreated disease, overdose, or being arrested because
15 they are unhoused. Without this funding, the populations we serve would suffer in immeasurable
16 ways.
17

18 15. Our municipal and state grant partners are sharing with us mixed messages from
19 their federal grantors. We get the impression that they are ready to sacrifice our subgrants to
20 keep their broader funding. They have not put anything in writing or made any public statements,
21 but that is the message we are getting through side conversations, in which they have told us that
22 whatever we put in the proposals is what they are sending along so there is no shielding our
23 trans-focused proposals from the federal grantors.
24

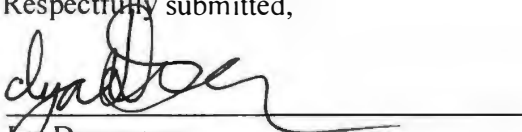
25 16. At an institutional level, the loss of this funding would be devastating as the core
26 of our programs would be jeopardized. Financially, it would take us years to rebuild BHS.
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1 Although we could try to fundraise, many of our philanthropic partners are also federally funded,
2 so the Executive Orders would not allow us to turn to them for support. In the short term, BHS
3 would not be able to operate as it currently does.

4 I declare under penalty of perjury under the laws of the United States of America that the
5 foregoing is true and correct.
6

7 Dated: February 24, 2025

Respectfully submitted,

8 
9 Iya Dammons