

1 JENNIFER C. PIZER (SBN 152327)  
2 *jpizer@lambdalegal.org*  
3 PELECANOS\*  
4 *pelecanos@lambdalegal.org*  
5 LAMBDA LEGAL DEFENSE AND  
6 EDUCATION FUND, INC.  
7 800 South Figueroa Street, Suite 1260  
8 Los Angeles, California 90017-2521  
9 Telephone: (213) 382-7600

10 JOSE ABRIGO\*  
11 *jabrigo@lambdalegal.org*  
12 OMAR GONZALEZ-PAGAN\*  
13 *ogonzalez-pagan@lambdalegal.org*  
14 LAMBDA LEGAL DEFENSE AND  
15 EDUCATION FUND, INC.  
16 120 Wall Street, 19th Floor  
17 New York, New York 10005-3919  
18 Telephone: (212) 809-8585

CAMILLA B. TAYLOR\*  
*ctaylor@lambdalegal.org*  
KENNETH D. UPTON, JR\*  
*kupton@lambdalegal.org*  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
3656 North Halsted Street  
Chicago, Illinois 60613-5974  
Telephone: (312) 663-4413

KAREN L. LOEWY\*  
*kloewy@lambdalegal.org*  
LAMBDA LEGAL DEFENSE AND  
EDUCATION FUND, INC.  
815 16th Street NW, Suite 4140  
Washington, DC 20006-4101  
Telephone: (202) 804-6245

*\*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.;

18 *Plaintiffs,*

19 v.

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

22 *Defendants.*

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

**DECLARATION OF JOE  
HOLLENDONER, CHIEF  
EXECUTIVE OFFICER OF THE LOS  
ANGELES LGBT CENTER, OFFICER  
OF THE LGBT COMMUNITY  
CENTER, IN SUPPORT OF  
PLAINTIFF'S COMPLAINT AND  
MOTION FOR PRELIMINARY  
INJUNCTION**

1 I, Joe Hollendonner, hereby state as follows:

2 1. I am the Chief Executive Officer of the Los Angeles LGBT Center (“LA LGBT  
3 Center”), a nonprofit 501(c)(3) organization based in Los Angeles, California, that provides a  
4 variety of services to members of the lesbian, gay, bisexual, transgender, and queer (“LGBTQ”)  
5 communities. I have served in this capacity since 2022. I joined the staff of the LA LGBT Center  
6 in 2021.

7  
8 2. I am submitting this Declaration in support of Plaintiffs’ Complaint and Motion for  
9 Preliminary Injunction, which seeks to prevent Defendant agencies and their leadership from  
10 enforcing Executive Order No. 14168 “Defending Women From Gender Ideology Extremism and  
11 Restoring Biological Truth to the Federal Government” (“Gender Order”), issued January 20, 2025;  
12 Executive Order No. 14151 “Ending Radical and Wasteful DEI Programs and Preferencing”  
13 (“DEI-1 Order”), issued January 20, 2025; and Executive Order No. 14173 “Ending Illegal  
14 Discrimination and Restoring Merit-Based Opportunity” (“DEI-2 Order”), issued January 21,  
15 2025 (collectively, the “Executive Orders”), and related agency directives.

16  
17 3. The LA LGBT Center was founded in 1969 and offers programs, services, and global  
18 advocacy that span four broad categories: health, social services and housing, culture and  
19 education, and leadership and advocacy. The mission of the LA LGBT Center is to fight bigotry  
20 and build a world where LGBT people thrive as healthy, equal, and complete members of society.  
21 Today the LA LGBT Center’s more than 800 employees provide services for more LGBTQ people  
22 than any other organization in the world, with more than 500,000 client visits per year.

23  
24 4. As the largest provider of services to LGBTQ people in the world, many of the LA  
25 LGBT Center’s patients tell us that they come to the LA LGBT Center seeking culturally  
26 competent health care due to being denied care or being discriminated against based on their real  
27 or perceived sexual orientation, gender identity, transgender status, and HIV status. The LA LGBT  
28

1 Center’s client population is disproportionately low-income and experiences high rates of chronic  
2 physical and mental conditions, homelessness, unstable housing, trauma and discrimination, and  
3 stigmatization in health care and social services. Our client population is diverse with respect to  
4 race and class, and more than 55% of our clients self-report that they are non-white or of Latinx  
5 heritage. Many of our clients come to the LA LGBT Center from different areas of California,  
6 other states, and even other nations to seek services in a safe and affirming environment.

7  
8 5. Respecting transgender people and advancing their civil rights is central to the LA  
9 LGBT Center’s identity, advocacy, and mission, and a necessary part of every aspect of the  
10 services we provide. Indeed, nearly every aspect of the services provided by the LA LGBT Center  
11 directly or indirectly impacts the transgender community, and the LA LGBT Center has provided  
12 its services to more than 6,000 transgender individuals over the past ten years—the majority of  
13 such services relating to their medical care.

14  
15 6. The LA LGBT Center is one of the nation’s largest and most experienced providers of  
16 LGBTQ health and mental health care. At the LA LGBT Center, we provide a wide spectrum of  
17 healthcare services, including, but not limited to, HIV treatment, testing, and prevention care, and  
18 mental health care. The LA LGBT Center also has medical providers who specialize in the care of  
19 transgender patients and who provide a full range of primary care services in addition to hormone  
20 therapy, pre- and post-surgical care, and trans-sensitive pap smears, pelvic exams, and prostate  
21 exams. The LA LGBT Center’s broad array of healthcare services are all under one organization,  
22 from counseling and therapy to pharmaceutical and nutrition needs. In many cases, these services  
23 are quite literally lifesaving.

24  
25 7. The LA LGBT Center is also a federal contractor, subcontractor, grantee, and  
26 subgrantee. The federal government is contractually obligated to provide the LA LGBT Center an  
27 estimated 22 million dollars of funding for use over multiple years. A significant portion of the  
28

1 LA LGBT Center’s revenue comes from federal programs, including, but not limited to, direct  
2 funding from the Department of Justice (DOJ) Office of Violence Against Women and the  
3 Department of Health & Human Services (HHS) divisions: Centers for Disease Control and  
4 Prevention (CDC); Health Resources and Services Administration (HRSA) Bureau of Primary  
5 Health Care, under which the LA LGBT Center is a Federally Qualified Health Center (FQHC);  
6 and the Administration for Children Youth & Families.

7  
8 8. As an FQHC, the LA LGBT Center is required to serve anyone on a nondiscriminatory  
9 basis who walks into its doors. We accept a variety of health insurance plans, including Medi-Cal  
10 (California’s Medicaid program), Medicare, and most private insurance plans, in addition to  
11 providing services to uninsured individuals. We work with these individuals to help them access  
12 insurance through Covered California (California’s Affordable Care Act “exchange”), and/or  
13 navigate other medical- and drug-assistance programs. Where insurance is not available, our  
14 services are offered on a sliding-scale basis, based on the ability to pay. We pride ourselves on  
15 providing leading-edge health care, regardless of individuals’ ability to pay.  
16

17 9. In order to help patients navigate healthcare services, program, and insurance, the LA  
18 LGBT Center employs “navigators,” which is a term for patient-facing staff members who provide  
19 assistance and support to patients facing barriers to care. To build trust and understanding,  
20 navigators often reflect the identities of those most impacted by health disparities, such as people  
21 of color, LGBTQ people, and people living with HIV. Navigators link patients to various services.  
22 A navigator’s job is to reduce and eliminate any barriers that someone may have to accessing  
23 health care. Navigators complete evidence-based internal and external trainings and are equipped  
24 with tools to work with clients in priority populations. Navigators engage patients receiving  
25 services to ensure ongoing engagement and retention in care, including establishing patient health  
26 and wellness goals and working with clients to achieve those goals. They learn how to become a  
27  
28

1 trusted source for people who often lack trust in health care providers due to previous experiences.  
2 Through relationship building and rapport building, navigators are successful in connecting  
3 patients to medical providers, mental health services, and other health offerings.

4 10. Some of the LA LGBT Center's navigators work with high-risk populations to help  
5 them access and remain on Pre-Exposure Prophylaxis (PrEP), a biomedical intervention that  
6 prevents HIV. Other navigators specialize in housing stabilization, retention in care for People  
7 Living with HIV (PLWH), substance use recovery, seniors, or young people. For example, Black  
8 and Latinx gay men experience disproportionate rates of new HIV diagnoses in Los Angeles  
9 County. This is due to systemic factors, such as housing insecurity, stigma in healthcare settings,  
10 employment discrimination, transportation barriers, and more. Navigators connect individuals to  
11 HIV and STI testing and treatment, PrEP and PEP, HIV care, housing resources, healthcare, mental  
12 health services, medication adherence, social supports, and other social services. Navigators thus  
13 serve as critical patient and provider resources to support ongoing and regular engagement in  
14 health care and social services. Navigators work within a larger care team of providers, nurses,  
15 social workers, and case managers to holistically address current or anticipated barriers to care and  
16 ongoing engagement in care. Navigators use an intersectional lens to inform their interventions to  
17 meet clients where they are, validate their experiences, and contextualize their experiences within  
18 a context of institutional and structural racism, homophobia, transphobia, sexism, and xenophobia.  
19  
20

21 11. In addition to client services, like some of the work performed by the LA LGBT  
22 Center's navigators, which is conducted pursuant to a federally funded grant that specifically funds  
23 outreach to gay Black and Latinx men about barriers to care, we also conduct research. The LA  
24 LGBT Center receives federal funding for research programs and is currently a participant in  
25 multiple federally funded studies, including through the NIH and CDC. Many of the LA LGBT  
26 Center's federally funded grants require the LA LGBT Center to acknowledge, address, and  
27  
28

1 combat HIV stigma and discrimination. For example, the LA LGBT Center participates in the  
2 MACS/WIHS Combined Cohort Study (MWCCS), the longest-running study of HIV and AIDS  
3 in the United States. Since early in the epidemic, the NIH has supported this study to understand  
4 the impact of HIV on every aspect of health and wellbeing. As people living with HIV can now  
5 lead long and healthy lives, the focus of the study has shifted to the impact of the disease on aging,  
6 the long-term impacts of antiretroviral medications, as well as chronic conditions such as  
7 cardiovascular disease, pulmonary disease, neurologic, and sleep disorders. Another example is  
8 the mStudy, a longitudinal study seeking to understand how drug use affects the immune system  
9 of HIV-positive and HIV-negative men who have sex with men.  
10

11 12. The LA LGBT Center works hard in numerous ways to identify and address disparities  
12 in access to health care and patient health inequities based on race, sex, national origin, and  
13 LGBTQ status. In addition to client services and research, the LA LGBT Center provides training  
14 to its own staff. Internal staff training educates the LA LGBT Center's staff on identifying and  
15 acknowledging disparities in underlying health conditions, understanding cultural and historical  
16 barriers to care, and combating implicit bias that could interfere with patient-provider interactions,  
17 the ability of patients to receive equitable access to care and patient outcomes. We have a Chief  
18 Equity Officer whose mission is to create a space where everyone—staff, as well as the community  
19 at large—feels safe in their intersectional identities. We have implemented an equity framework  
20 on such issues to train our staff, from the Board to volunteers, which is meant to acknowledge and  
21 address systemic racism and the role of implicit bias in contributing to health disparities, including  
22 anti-LGBTQ bias. Lack of such training would exacerbate health care disparities that LGBTQ  
23 people, trans people, and people of color face in the broader health care environment—a directly  
24 contradictory outcome to the LA LGBT Center's grant mandates and fundamentally at odds with  
25 the LA LGBT Center's mission to provide the highest quality care to patients and clients without  
26  
27  
28

1 discrimination. Without addressing topics such as implicit bias and grappling with historical  
2 racism and anti-LGBTQ bias in the medical and social sciences fields, the LA LGBT Center cannot  
3 successfully fulfill the obligations of its federal funding. Such training is inherent in the work the  
4 LA LGBT Center has been funded to do.

5 13. In addition to training its own staff on cultural competency, the LA LGBT Center  
6 performs external trainings for partner organizations, providers, and the public. Our medical  
7 provider trainings mitigate the risk that providers subject patients to trauma and undermine doctor-  
8 patient trust, which can result from a provider harboring damaging sex-based stereotypes about  
9 LGBTQ people, particularly transgender people, and related bias—whether implicit or explicit. A  
10 transgender patient who experiences such discrimination will be far less likely to receive the health  
11 care treatment that they need because, after being discriminated against, they are unlikely to seek  
12 other care out of fear of repeated rejections. In turn, this type of delay has obvious and serious  
13 medical ramifications—both for the individuals and for public health at large—which results in  
14 increased costs to the LA LGBT Center and the health care system generally. The LA LGBT  
15 Center also provides numerous mental health related services, which are particularly important for  
16 our many patients who have experienced traumatic discrimination based on sexual orientation,  
17 gender identity, transgender status, HIV status, and other factors. The LA LGBT Center has  
18 received federal funding to perform trainings for providers at other institutions, this includes  
19 funding from the HHS Family and Youth Services Bureau, which funds the LA LGBT Center’s  
20 operation of the National LGBTQ Institute on Intimate Partner Violence, and a grant from the DOJ  
21 Office on Violence Against Women to provide training and technical assistance on serving  
22 LGBTQ youth survivors of domestic violence, sexual assault, dating violence, stalking, and the  
23 overlap with commercial sexual exploitation.  
24  
25  
26  
27  
28



1 14. The LA LGBT Center's Youth Services team also conducts external trainings directed  
2 at cultural competency in working with LGBTQ foster youth and in creating safe and affirming  
3 schools, amongst other topic areas. Many of the recipients of these trainings, including schools  
4 and the California Department of Child and Family Services also receive federal funding. We also  
5 have staff at our Trans Wellness Center who regularly facilitate cultural competency trainings at  
6 numerous workplaces, and to other social service providers specific to the experience of  
7 transgender, gender non-conforming, and intersex communities. Many of these trainings, if not all  
8 of them, contain an explicit acknowledgment of systemic racism and implicit biases with respect  
9 to race, sex, and LGBTQ status. Additionally, most trainings have a significant focus on the  
10 experiences of the transgender community, including the systemic barriers that the transgender  
11 community faces and the resulting harm caused by these barriers.  
12

13 15. The baseless and confusing Executive Orders threaten the work of the LA LGBT  
14 Center. One of the many examples of that threat relates to our National LGBTQ Institute on  
15 Intimate Partner Violence ("the Institute"). This federally funded Institute provides training and  
16 technical assistance to domestic violence and sexual assault providers across the country to ensure  
17 services are inclusive of LGBTQ people. The Institute was initially known as a Capacity Center  
18 when work began on it in 2013. Then in 2017, that work evolved into a National Institute as part  
19 of the federal Domestic Violence Resource Network, now rebranded as the federal Gender Based  
20 Violence Resource Network. In September 2020, the LA LGBT Center was awarded the federal  
21 contract to operate the Institute, which was formally relaunched a year later. This work is necessary  
22 because queer and transgender people experience disproportionate rates of violence and need care  
23 that is affirming of their sexual orientation and gender identity or expression.  
24

25 16. While the Center remains resolute in conducting the trainings that we are contractually  
26 obligated to provide, we are already seeing the dire consequences of these Executive Orders.  
27  
28



1 Domestic violence and sexual assault providers across the country have already begun removing  
2 information about the LGBTQ inclusivity of their programs. These censorship actions are directly  
3 motivated by President Trump and his administration's assertions that their federal funding will  
4 be pulled, and is a prime example of the deliberate lack of clarity baked into these Executive  
5 Orders—an intentional ambiguity designed to confuse, intimidate, and stifle organizations by  
6 weaponizing undefined terms like “gender ideology” and “DEI preferencing.” In addition, our  
7 Institute staff have heard domestic violence programs announce that they would no longer serve  
8 transgender survivors or are questioning if their program is still allowed to serve transgender  
9 survivors because of the Executive Orders. The actions of our partners leave countless survivors—  
10 particularly transgender and nonbinary people—without competent care when they are in crisis.

12 17. The staff at the LA LGBT Center who perform these internal and external trainings are  
13 now concerned that their programming and presentations will be used as a justification for  
14 suspending or terminating the LA LGBT Center's federal funding from grants and contracts. Such  
15 censorship can defeat the purpose of the training and leave the audience without the tools necessary  
16 to ensure nondiscriminatory services to vulnerable communities. Besides the trainings, the LA  
17 LGBT Center staff members are also concerned about how to speak on behalf of the LA LGBT  
18 Center or interact in culturally inclusive and affirming ways with our patients and clients.  
19 Notwithstanding the practical difficulties of interpreting the Executive Orders, each staff member  
20 must worry about what they are allowed to say about the LA LGBT Center's mission and the  
21 importance of having an affirming and nondiscriminatory environment in which to seek medical  
22 care and other services for LGBTQ people, particularly transgender people, people from  
23 marginalized communities, and people of color. As a practical matter, it also appears that the  
24 Executive Orders restrict the LA LGBT Center's ability to advertise our services, and the  
25 Executive Orders restrict other federally funded organizations from partnering with us or  
26  
27  
28

1 participating in our trainings, which naturally undermines the LA LGBT Center’s ability to meet  
2 its obligations under federal grant funding.

3 18. And critically, the Gender Executive Order prohibits the promotion of “gender  
4 ideology,” seeming to condition federal funding on the denial of the very existence of transgender  
5 people. It is impossible for the LA LGBT Center to fulfill its mission and provide any of its services  
6 to transgender patients and clients without acknowledging and recognizing transgender people for  
7 who they are. Part of the LA LGBT Center’s mission is to “fight against bigotry” and to help “build  
8 a better world—a world in which LGBTQ people can be healthy, equal, and complete members of  
9 society.” Accordingly, our values of “courage” and “liberation” require us to “center the members  
10 of our community who need our care the most” and “to ensure the safety and freedom of *all*  
11 LGBTQ people.” This includes recognizing the existence, identities, and experience of our  
12 transgender and gender diverse community members. Because we must do so in every aspect of  
13 our work, it is impossible for the LA LGBT Center to comply with or accede to the Gender  
14 Executive Order’s requirement that we deny the existence of transgender people. We exist to serve  
15 all members of the LGBTQ community, and we will not abandon transgender people, a vulnerable  
16 segment of our community, as a condition of federal funding that is necessary to provide our wide  
17 array of services to thousands of people across the Greater Los Angeles area, and indeed, the world.

18 19. Trainings—whether internal or external—only comprise one part of the comprehensive  
19 services we offer to accomplish our mission, and the Executive Orders call into question whether  
20 other substantive work performed by the LA LGBT Center could be subject to scrutiny. For  
21 example, nowhere do the Executive Orders explain exactly what it means to “promote” so-called  
22 “gender ideology.” Similarly, the Executive Orders do not define the terms “diversity, equity, and  
23 inclusion,” “DEI,” “diversity, equity, inclusion, and accessibility,” or “DEIA.” The term “equity”  
24 when used independently from “diversity, equity, inclusion, and accessibility” is particularly  
25  
26  
27  
28

1 vague and ambiguous. One of the Executive Orders says it is terminating “equity-related” grants  
2 and contracts, along with other DEI and DEIA activities. One of the Executive Orders also  
3 mandates OMB to excise references to DEI and DEIA *principles, under whatever name they may*  
4 *appear* from Federal acquisition, contracting, grants, and financial assistance procedures. The LA  
5 LGBT Center’s staff, therefore, cannot be certain what speech or activity might be considered DEI  
6 or DEIA “principles” even without using the actual terms “DEI” or “DEIA.” Beyond the confusing,  
7 undefined terminology, the LA LGBT Center and its partner organizations cannot figure out to  
8 what extent these Executive Orders seek to censor speech and actions beyond our grant-funded  
9 work. Does it extend to anything and everything our organizations say and do?

11 20. The LA LGBT Center also engages in numerous targeted initiatives that may—or may  
12 not—fall within the ambit of the ambiguous language of the Executive Orders. Consider the  
13 following examples. The LA LGBT Center engages in advertising around Pre-Exposure  
14 Prophylaxis (“PrEP”) and HIV prevention, particularly targeting young queer men of color, which  
15 is intended to build trust and community around the LA LGBT Center’s medical care and  
16 prevention services. The LA LGBT Center’s Trans Wellness Center has a specific focus on care  
17 for transgender and non-binary clients. The LA LGBT Center also has programs for monolingual  
18 Spanish speakers, programs on violence prevention with an emphasis on transgender women of  
19 color, programs providing post-incarceration linkages into services, and provides information to  
20 assist sex workers in negotiating safety. These offerings are fundamental to the LA LGBT Center’s  
21 mission, and our staff must be fluent in these and related concepts that may be considered as  
22 “promoting” “gender ideology” or relating to “DEI,” “DEIA,” or “Equity” as those terms are used  
23 in the Executive Orders.

26 21. Notwithstanding the Executive Orders, a significant number of LGBTQ patients fear  
27 going to a healthcare provider due to negative past experiences directly related to their sexual  
28

1 orientation, gender identity, or transgender status. The LA LGBT Center's providers have  
2 personally observed patients arriving at the LA LGBT Center with acute medical conditions that  
3 could have been avoided but-for the patients' reluctance to seek routine and necessary medical  
4 care for fear of discrimination. Even so, under the Executive Orders, the stories that the LA LGBT  
5 Center staff are hearing about discrimination in health care have shifted dramatically. The  
6 Executive Orders have resulted in a marked increase in anxiety, depression, and distress in our  
7 patients. They express deep concern and sometimes even panic that the Executive Orders will  
8 prevent them from receiving the life-saving care that they require. We are hearing this from all  
9 sectors of the LGBTQ community, including folks living with HIV, those who are undocumented,  
10 patients on gender affirming therapy, and individuals needing hormonal contraception for  
11 pregnancy prevention and menstrual related concerns. Medical providers are spending a significant  
12 amount of time in clinical encounters discussing these concerns and offering reassurance that we  
13 intend to continue providing care to all of our patients regardless of the external political  
14 environment. However, this does put added stress on our providers and care team, who are  
15 themselves very concerned about the ways that the Executive Orders will impact them personally  
16 and professionally.

19 22. At its core, the LA LGBT Center's mission includes ensuring LGBTQ individuals,  
20 particularly transgender people, of all backgrounds can be healthy, equal, and complete members  
21 of society. The Executive Orders make it difficult, if not impossible, for the LA LGBT Center to  
22 continue providing the same level of social, mental, and physical health care and related social  
23 services to its patients, external partners, and the public.

25 23. The Executive Orders are part of a calculated assault on transgender rights, seeking to  
26 undermine and even deny the dignity, safety, and existence of our transgender and gender diverse  
27 community. While the LA LGBT Center plainly cannot accomplish its mission—and its mandates

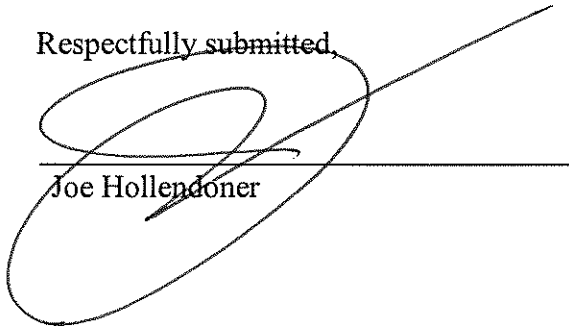
1 under existing grants—should the Executive Orders be allowed to stand, we will not allow bigotry,  
2 misinformation, or fearmongering to dictate who gets to access care. The LA LGBT Center is firm  
3 in its commitment that every transgender person deserves to live safely, authentically, and with  
4 dignity.

5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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

3 Dated: February 25, 2025

Respectfully submitted,

4   
5 \_\_\_\_\_  
6 Joe Hollendonner

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28