



C A L I F O R N I A

DEPARTMENT OF JUSTICE

SENATE BILL X1-1
ANNUAL REPORT

AUGUST 1, 2025



I. INTRODUCTION

Section 1 of Senate Bill X-1-1 (SBX1-1, Chapter 3, Statutes of 2025) appropriates up to \$25 million to the Department of Finance (DOF) for the purpose of “defending the State against enforcement and legal actions taken by the federal government, filing affirmative litigation challenging actions taken by the federal government, and taking administrative action authorized under state law to mitigate the impacts of actions taken by the federal government.” This report uses the phrase “federal accountability litigation” to refer to such matters. To date, the Department of Justice (Department) has received \$5 million in allocations from DOF pursuant to SBX1-1.

SBX1-1 requires the Department to provide DOF and the Joint Legislative Budget Committee with annual reports on the use of any funds allocated pursuant to SBX1-1 on or before August 1 each year through August 1, 2028. SBX1-1 requires the Department to report generally “on the use of funds allocated pursuant” to the bill’s funding augmentation provisions through August 1, 2028. SBX1-1 also requires the Department to report on two specific categories of information: (1) “[w]hether the state is contracting with outside counsel, and the costs, if any;” and (2) “[e]ach instance in which the Department of Justice is taking administrative action authorized under state law to mitigate the impacts of actions taken by the federal government.”

In compliance with that requirement, this Mandated Report (Report) provides an overview of the Department’s federal accountability litigation and includes responsive information for each statutorily required reporting category as of July 30, 2025. In addition, regular updates of the Department’s federal accountability work can be found at <https://oag.ca.gov/federal-accountability/>.

II. AFFIRMATIVE FEDERAL ACCOUNTABILITY LITIGATION

A. Results of Department Actions

Between January 20, 2025 through July 30, 2025, the Department filed 36 lawsuits challenging presidential administration actions, each described below in Subsection B. As of July 30, 2025, the Department has also filed 47 amicus briefs in support of lawsuits brought by other parties challenging the federal government. The Department has also issued 15 regulatory comment letters, in addition to public guidance, in response to actions taken by the federal government. The \$5 million in SBX1-1 funds that the Department has received to date has contributed to—but in no way has been sufficient to cover—the costs of the litigation summarized below.

The Department’s affirmative litigation has been broadly successful in the trial courts. To date, the Department and our multistate colleagues have obtained 16 court orders for immediate equitable relief. This includes cases challenging massive, agency-dismantling reductions in force at several federal agencies, large-scale funding cuts, an attack on California’s immigrant protection laws, and rollbacks of environmental programs. In two cases, we have already obtained judgments in our favor at the trial court level.

The Department’s efforts have generated a tremendous return for California. A few examples are illustrative.

One critical case arose at the very beginning of the calendar year. Less than a week after President Trump’s inauguration, on January 26, 2025, the Office of Management and Budget issued a directive that purported to freeze nearly \$3 trillion in federal funding. Joined by 22 other states, the Department led a challenge to this directive on behalf of California that resulted in an immediate temporary

restraining order and subsequent preliminary injunction, restoring the vital flow of federal dollars. Through this single piece of litigation, the Department acted swiftly to preserve roughly \$168 billion in federal funding for California, representing about one-third of the State's budget. The Department has subsequently successfully enforced the preliminary injunction against the federal government on multiple occasions, leveraging our success to ensure ongoing funding streams continue to flow to the State.

Similarly, the Department acted to protect approximately \$11 billion in critical public health funding nationwide, including roughly \$972 million for California. Beginning on March 24, 2025, the U.S. Department of Health and Human Services abruptly, with no advance notice or warning, issued termination notices to state and local public health agencies across the country, purporting to end federal funding for grants that provide essential support for a wide range of urgent public health needs, including identifying, tracking, and addressing infectious diseases; ensuring access to immunizations; and modernizing critical public health infrastructure. Congress had appropriated this federal funding to prepare our nation for future public health threats. On April 3, 2025, the Department and our multistate partners obtained a temporary restraining order restoring the flow of that essential funding. That order has since converted to a preliminary injunction that remains in effect.

In other cases, the Department has taken steps to protect California's values. In two actions, for example, the Department has led coalitions challenging new federal funding conditions that require state grant recipients to promise cooperation with federal immigration enforcement as a precondition to receiving funds. In another suit, the Department sued to protect California schools from federal retribution if they comply with State anti-discrimination law. In yet another action, the Department acted quickly to challenge the federal government's efforts to deploy military troops in aid of immigration raids in Los Angeles.

As these cases demonstrate, the Department has put SBX1-1's appropriation to good use, protecting significant funding streams and defending California's interests. In addition to its current litigation, the Department continues to advance a number of early-stage matters that will provide further benefits to Californians and to investigate and analyze the lawfulness of new or proposed federal policies.

A more detailed review of the Department's affirmative cases filed through July 30, 2025 follows.

B. Pending Litigation

1. New Jersey v. Trump, No. 24-cv-10139, D. Mass. (Birthright Citizenship)

This case, the first multistate federal accountability matter of the second Trump Administration, challenges the President's unconstitutional executive order seeking to end birthright citizenship. Under the Administration's proposed order, an estimated 24,500 children born in California annually would be denied the citizenship they are entitled to under the U.S. Constitution.

The district court granted the coalition's motion for a preliminary injunction on February 13, 2025, and the federal government appealed to the First Circuit. The government sought a stay of the district court order pending appeal and the Supreme Court ruled on that request on June 27, 2025. In its decision, the Supreme Court announced a new standard for nationwide injunctions, sending consideration of the scope of the injunction back to the district court. The District Court issued a nationwide injunction in our favor again on July 25, 2025.

**2. New York v. Trump, No. 25-cv-00039, D.R.I.
(OMB Funding Freeze)**

A multistate coalition, co-led by California, challenged the Trump Administration’s purported directive freezing up to \$3 trillion in federal funding. In just this fiscal year, California is expected to receive \$168 billion in federal funds – 34% of the State’s budget – not including funding for the State’s public college and university system. This includes \$107.5 billion in funding for California’s Medicaid programs, which serve approximately 14.5 million Californians, including 5 million children and 2.3 million seniors and people with disabilities. Additionally, over 9,000 full-time equivalent State employee positions are federally funded.

The district court granted the motion for a preliminary injunction on March 6, 2025, and granted a motion to enforce compliance with the preliminary injunction on April 4. The Department continues to monitor compliance with the preliminary injunction. The federal government filed a notice of appeal of the preliminary injunction on March 10, 2025 and the First Circuit denied a stay of the preliminary injunction order pending that appeal on March 26, 2025.

**3. New York v. Trump, No. 25-cv-01144, S.D.N.Y.
(DOGE Treasury Access)**

Nineteen states including California challenge the Trump Administration’s expanded access to data maintained by the Treasury Department’s Bureau of the Fiscal Service, which allowed unqualified Department of Government Efficiency (DOGE) employees to unlawfully access Americans’ personal information. The district court initially granted a temporary restraining order and subsequently entered a preliminary injunction on February 21, 2025. That order precluded political appointees and any government employee from an agency outside the Treasury Department’s Bureau of Fiscal Services, including members of DOGE, from accessing Treasury Department records. The court also prohibited access to Treasury Department material by any person outside of civil servants within the Bureau of Fiscal Services who has not passed all background checks and security clearances. The district court has since partially dissolved the preliminary injunction as to five employees who have met the training and security requirements set forth in the order.

**4. Massachusetts v. National Institutes of Health, No. 25-cv-10338, D. Mass.
(NIH Indirect Cost Cap)**

This litigation challenges the Trump Administration’s unlawful revocation of funds that support cutting-edge medical and public health research at universities and research institutions across the country by capping the amount of “indirect costs” National Institute of Health (NIH) grantees may recover from the federal government at 15%. The impact on California is significant; in Fiscal Year 2023, the University of California received a total of over \$2 billion in NIH contract and grant funding. The California State University received approximately \$158 million in NIH funds.

The district court granted the motion for a preliminary injunction on March 5, 2025. The federal government appealed on April 8, 2025, and the case is now fully briefed before the First Circuit.

**5. New Mexico v. Musk, No. 25-cv-00429, D.D.C.
(DOGE Appointments Clause)**

This case challenges the President’s unlawful appointment of Elon Musk as the head of DOGE without the advice and consent of the Senate, and the unlawful creation of DOGE as an entity without Congressional approval. DOGE has taken action to dismantle federal agencies and has disrupted billions of dollars in federal funding essential for law enforcement, healthcare, education, and other critical services. The multistate coalition filed the complaint on February 13, 2025. The court granted the states’ motion for expedited discovery. The government appealed and, in the meantime, moved to dismiss the case. On May 27, 2025, the district court denied the motion to dismiss as to all defendants except President Trump, permitting the case to move forward on the merits.

**6. California v. Dep’t of Education, No. 25-cv-10548, D. Mass.
(Teacher Preparation Grants)**

This case challenges the Department of Education’s unlawful termination of significant grant funding for K-12 teacher preparation programs, valued at roughly \$148 million for California programs that address the State’s teacher shortage.

The district court entered a temporary restraining order, which the government appealed. The Supreme Court issued a stay of that order on April 4, 2025, concluding that the government was likely to prevail on a jurisdictional argument. The multistate coalition has since filed an amended complaint and the government has filed a motion to dismiss, which remains pending.

**7. Maryland v. Dep’t of Agriculture, No. 25-cv-00748, D. Md.
(Probationary Employee Terminations)**

This case challenges widespread firings of federal probationary employees across a number of agencies. These employees, at the beginning of their careers in federal service, work in important roles within agencies that provide critical partnership to California, including the Departments of Veterans’ Affairs and Agriculture, the National Park Service, and the U.S. Forest Service.

The district court issued a preliminary injunction, and the federal government appealed that order. The Fourth Circuit issued a stay pending appeal on April 9, 2025, and heard oral arguments on the merits of the preliminary injunction on May 6, 2025. The multistate coalition awaits a ruling from that court.

**8. New York v McMahon, No. 25-cv-10601, D. Mass.
(Dep’t of Education Dismantling)**

This litigation challenges the federal government’s mass terminations of Department of Education employees and the transfer of core statutory functions to other departments. The U.S. Department of Education provides \$7.9 billion annually in federal funding to more than 9,000 public schools across California – serving 5.8 million students. This includes funding for Title I to support low-income families, Individuals with Disabilities Education Act funds and support for students with disabilities, school lunch programs, services to families living on military bases and Indian reservations, and post-secondary financial aid. The mass firings have led to the closure of seven regional offices of the Office for Civil Rights, including the one in San Francisco, leaving 1,500 pending cases, including open investigations, cases in mediation, resolved cases under monitoring, and complaints under research by staff, in limbo.

The district court issued a preliminary injunction that was subsequently stayed by the Supreme Court. The federal government’s opening merits brief is due to the First Circuit on August 4, 2025.

**9. Colorado v. Dep’t of Health and Human Services, No. 25-cv-00121, D.R.I.
(Public Health Grants)**

In this case, a multistate coalition challenges the federal government’s unlawful termination of approximately \$11 billion in critical public health funding. California’s portion of these cancelled grants amounts to roughly \$972 million, including over \$800 million that the California Department of Public Health intended to use, in part, to vaccinate 4.5 million children statewide and assist hospitals in directing injured and ill patients to available emergency facilities, and over \$119 million that the California Department of Health Care Services uses to support key programs, including substance use disorder prevention and early intervention services for youth in at least eighteen counties. It also includes over \$45 million that the Los Angeles County Department of Public Health was planning to use, in part, to strengthen its efforts to prevent the spread of measles, and seasonal and avian influenza.

On May 16, 2025, the district court granted the multistate coalition’s motion for a preliminary injunction. Thus, standing alone, this litigation represents just under \$1 billion in federal funds preserved through the Department’s federal accountability work.

**10. California v. Trump, No. 25-cv-10810, D. Mass.
(Elections Executive Order)**

California is leading a challenge in this case to President Trump’s unlawful executive order that purports to dramatically rework the manner of conducting federal elections without any input from Congress. The executive order sought to impose a narrow, draconian, and legally unsupported interpretation of federal election day statutes that would have upended mail balloting procedures in many States, including California. It likewise sought to impose a documentary proof of citizenship requirement for voters who chose to register to vote in federal elections using the federal mail-in registration form.

On June 12, 2025, the district court granted the multistate coalition’s motion for a preliminary injunction, enjoining all challenged aspects of the executive order. The government filed a motion to narrow the scope of the injunction in early July, which remains pending.

**11. Rhode Island v. Trump, No. 25-cv-00128, D.R.I.
(Small Agency Dismantling)**

This litigation challenges President Trump’s executive order that sought to completely eliminate essentially all components of seven smaller federal agencies, including (among others) the Institute of Museum and Library Services, the Minority Business Development Agency, the Federal Mediation and Conciliation Service, and the US Interagency Council on Homelessness. California’s state library budget for this fiscal year included \$15.7 million in funding from the Institute of Museum and Library Services, allocated for staffing and continued operations.

The district court entered a preliminary injunction on May 13, 2025. The federal government unsuccessfully sought stays of that order pending appeal in the district court and with the First Circuit.

**12. Massachusetts v. Kennedy, No. 25-cv-10814, D. Mass.
(NIH Grant Terminations)**

In this case, the multistate coalition challenges the federal government’s failure to disperse National Institutes of Health grant funding and the unlawful termination of existing grants for medical and public health research institutions nationwide. In 2024, NIH awarded \$5.15 billion in grants and contracts that directly supported 55,324 jobs and \$13.81 billion in economic activity in California.

After dividing the case into phases, the district court held a bench trial on the multistate coalition’s Administrative Procedure Act claims against the challenged grant terminations. On June 23, 2025, the court entered a partial final judgment in our favor for Phase 1, concluding that the challenged grant terminations are arbitrary and capricious under the Administrative Procedure Act. The federal government appealed that judgment to the First Circuit and sought a stay pending appeal with the district court, which the district court denied on June 24, 2025. The government then sought an emergency stay with the First Circuit, which denied emergency relief and set a briefing schedule on the government’s motion for a full stay pending appeal.

**13. New York v. Dep’t of Education, No. 25-cv-02990, S.D.N.Y.
(Education Stabilization Funding)**

This case challenges the Department of Education’s unlawful rescission of prior agency actions that preserved States’ access to hundreds of millions of dollars in funding currently being used by school districts to support the academic recovery of students following the COVID-19 pandemic. In California alone, over \$200 million in previously awarded and obligated funding is at stake—funding that school districts are already putting to use for programs such as afterschool and summer learning initiatives, the purchase of educational technology, and the provision of mental health services and support.

On May 6, 2025, the district court granted the multistate coalition’s motion for a preliminary injunction. The federal government then issued a new rescission letter modifying the liquidation period for education stabilization funds, prompting the multistate coalition to file a second motion for a preliminary injunction on May 14, 2025. The district court issued a temporary restraining order blocking the new rescission letter and subsequently issued a second preliminary injunction on June 3, 2025. The federal government appealed to the Second Circuit and sought a stay of the district court’s order. The Second Circuit denied the stay request on June 20, 2025.

**14. California v. Trump, No. 25-cv-03372, N.D. Cal.
(Tariffs)**

This litigation challenged President Trump’s illegal effort to impose tariffs under the International Emergency Economic Powers Act of 1977. The tariffs challenged under the lawsuit will reduce U.S. economic output by more than \$178 billion, reduce labor supply by 546,000 full-time equivalent jobs, and lower after-tax incomes on average by nearly a full percentage point. The loss to California’s economy, as the nation’s largest importer and second-largest exporter, would be \$25 billion, with job losses of more than 64,000.

California filed its case in the Northern District of California. The government argued that the case belonged before the Court of International Trade. The court agreed with the federal government’s jurisdictional argument but, at California’s request, it dismissed the case instead of transferring it. This procedural mechanism permitted the Department to appeal the lower court’s order to the Ninth Circuit, where the case remains pending. The Ninth Circuit granted California’s request for an expedited appeal on June 18, 2025.

**15. New York v. Dep’t of Education, No. 25-cv-11116, D. Mass.
(Title VI Diversity, Equity, and Inclusion Certifications)**

In this action, a multistate coalition co-led by California challenges the Department of Education’s efforts to withhold federal funding from State and local agencies that refuse to abandon lawful programs and policies that promote equal access to education. California receives approximately \$7.9 billion each year from the Department of Education to support a wide variety of needs and services related to children and education. The multistate coalition filed its lawsuit on April 25, 2025 and the federal government filed an answer on June 30, 2025.

**16. Maryland v. Corp. for National & Community Services, No. 25-cv-01363, D. Md.
(AmeriCorps Funding Disruptions and Dismantling)**

This litigation challenges the DOGE-led effort to dismantle AmeriCorps, both by terminating approximately 85% of its employees and volunteers, and by canceling approximately \$400 million in grants—accounting for more than 40% of the agency’s budget. AmeriCorps funding helped support at least 6,150 California volunteers serving at more than 1,200 locations throughout the State. The district court largely granted the plaintiff states’ motion for a preliminary injunction on June 5, 2025.

**17. Washington v. Dep’t of Transportation, No. 25-cv-00848, W.D. Wash.
(National Electrical Vehicle Infrastructure Program)**

This action challenges the Federal Highway Administration’s unlawful directive to withhold billions of dollars in funding approved by bipartisan majorities in Congress for electric vehicle charging infrastructure. California’s State Electric Vehicle Infrastructure Deployment Plan anticipated that California would need several hundred more EV charging ports to support light-duty cars and trucks and incrementally more charging ports for medium- and heavy-duty trucks and buses to meet climate goals. The plan, approved by the federal government, would leverage public funding and private investment to build out a statewide charging infrastructure, including \$384 million from the National Electric Vehicle Infrastructure program.

The district court granted the multistate coalition’s motion for a preliminary injunction on June 24, 2025.

**18. New York v. Kennedy, No. 25-cv-00196, D.R.I.
(HHS Dismantling)**

This action challenges the President’s attempts to dismantle the Department of Health and Human Services (HHS) in the wake of Secretary Kennedy’s “Make America Healthy Again” Directive. The litigation challenges the unlawful mass termination of roughly 10,000 full-time HHS employees, the consolidation of 28 HHS divisions into 15 divisions, and the closing of half of HHS’s ten regional offices—including one in San Francisco.

On July 1, 2025, the district court granted the multistate coalition’s motion for a preliminary injunction.

**19. New York v. Trump, No. 25-cv-11221, D. Mass.
(Wind Energy)**

A coalition of states with particular interest in the development of offshore wind energy, including California, filed this litigation in May 2025 challenging the federal government's efforts to freeze development of this homegrown source of reliable, affordable energy. Offshore wind projects support hundreds of thousands of jobs, create billions of dollars in economic activity and tax payments, and already supply more than 10% of the country's electricity. California has five federal offshore wind leases; two are located offshore by Humboldt, while the remaining three are offshore from Morro Bay. These new developments are designed to bring substantial amounts of clean energy to the grid, including enough to power 1.6 million homes and potentially more.

After a June hearing, the district court denied the bulk of the government's motion to dismiss the case and set a case schedule for a merits determination. A summary judgment hearing is set for September 4, 2025.

**20. Washington v. Trump, No. 25-cv-00869, W.D. Wash.
(National Energy Emergency/Clean Water Act Permits)**

This litigation challenges President Trump's "energy emergency" executive order, together with the Army Corps of Engineers' and the Advisory Council on Historic Preservation's actions pursuant to that order. These orders and actions are a misuse of emergency procedures meant for disaster response, bypassing important health and environmental protections for the benefit of the fossil fuel industry. A multistate coalition including California filed the initial complaint on May 9, 2025.

**21. Illinois v. Federal Emergency Management Agency, No. 25-cv-00206, D.R.I.
(DHS Funding Conditions)**

This case challenges unlawful immigration assistance conditions that the Department of Homeland Security imposed on vital sources of funding, including for disaster relief. California also receives around \$20 billion in funding from DHS to prepare for, protect against, respond to, and recover from terrorist attacks and other catastrophes. This includes counterterrorism grants, grants that allow States to prepare for terrorism in high-concentration urban areas, emergency preparedness grants, cybersecurity grants, and many others that are similarly not connected to civil immigration enforcement.

After a multistate coalition co-led by California filed the complaint on May 13, 2025. The parties agreed to a merits briefing schedule, where all briefing on the parties' cross-motions for summary judgment will be complete on August 11, 2025.

**22. California v. Dep't of Transportation, No. 25-cv-00208, D.R.I.
(DOT Funding Conditions)**

This is another lawsuit challenging unlawful funding conditions, here immigration assistance conditions imposed by the Department of Transportation (DOT). California receives over \$15.7 billion in grant funding from DOT to support and maintain the roads, highways, railways, airways, and bridges that connect our communities and carry State residents to their workplaces and their homes. Neither the purpose of these grants, nor their grant criteria, are in any way connected to immigration enforcement.

The district court granted the plaintiff states' motion for a preliminary injunction on June 19, 2025 and denied the federal government's request for a stay of that order.

**23. New York v. National Science Foundation, No. 25-cv-04452, S.D.N.Y.
(Research Funding)**

In this lawsuit, a multistate coalition including California seeks to prevent the National Science Foundation from terminating grants for scientific research that seek to promote and research issues related to diversity in higher education and the workforce, as well as from imposing a 15% cap on indirect cost reimbursements for research projects.

The multistate coalition filed its lawsuit and a motion for a preliminary injunction on May 28, 2025, and the district court held a hearing on July 9, 2025. The parties await a decision.

**24. California v. Dep’t of Justice, No. 25-cv-04863, N.D. Cal.
(Title IX/AB 1955)**

In this case, the Department filed a lawsuit against the federal Department of Justice in anticipation of imminent legal retaliation against California’s school systems related to their compliance with longstanding state anti-discrimination laws that provide for K-12 student participation in sports consistent with gender identity. The case asks the district court to uphold California’s anti-discrimination law and prevent the federal government from taking retaliatory action, such as withholding or conditioning federal funding, over the State’s refusal to comply with the federal government’s unlawful demand that school districts certify they will not comply with California law. The Department filed this lawsuit on June 9, 2025.

**25. Newsom v. Trump, No. 25-cv-04870, N.D. Cal.
(Federalization of National Guard)**

In this emergency litigation, the Department represents both Governor Newsom and the State of California in an action challenging orders purporting to federalize the California National Guard for 60 days under 10 U.S.C. § 12406 and to deploy the U.S. Marines to the greater Los Angeles area. The federal government’s orders came without authorization from the governor and against the wishes of local law enforcement.

The Department filed this case on June 9, 2025, and followed it with a request for a temporary restraining order on June 10, 2025. After a hearing on June 12, 2025, the district court granted the Department’s request for a temporary restraining order. The federal government immediately appealed and obtained a stay of the district court’s order from the Ninth Circuit. That appeal is being briefed. The case proceeds in the district court on issues that were not a part of the temporary restraining order. The court granted the Department’s request for expedited discovery on June 25, 2025. The Department filed a motion for a preliminary injunction and both sides will submit supplemental briefing on that motion at the conclusion of the expedited discovery period.

**26. California v. United States of America, No. 25-cv-04966, N.D. Cal.
(Congressional Review Act/Clean Air Act Waivers)**

This case challenges the unprecedented and unlawful use of the Congressional Review Act to upend California's clean vehicles program, specifically the Advanced Clean Cars II, Omnibus, and Advanced Clean Trucks standards. California applies these standards pursuant to congressionally authorized preemption waivers under the Clean Air Act. If California is prevented from enforcing these vehicle emission standards, it will result in the loss of significant economic and public health benefits, costing California taxpayers an estimated \$45 billion in preventable health care costs. Losing these standards would also undermine market certainty for vehicle manufacturers, stifling innovation and job creation, including in the electric vehicle sector, which has been a growing source of high-paying green jobs and investment. A multistate coalition led by California filed this case on June 12, 2025.

**27. New Jersey v. Office of Management and Budget, No. 25-cv-11816, D. Mass.
(Agency Priorities Terminations)**

In this multistate case, the coalition challenges the federal government's ongoing, repeated, and improper use of a single subclause buried in federal regulations promulgated by the Office of Management of Budget, 2 C.F.R. § 200.340(a)(4), to terminate tens of billions of dollars in grant funding to the States. Federal agencies ranging from the Department of Justice to the Environmental Protection Agency to the Department of Labor have terminated essential funding upon which California and its partner states rely to combat violent crime, prevent terrorist attacks, educate students with special needs, respond to natural disasters, protect clean drinking water, conduct life-saving medical and scientific research, upgrade crumbling transportation infrastructure, and much more. The multistate coalition filed this litigation on June 24, 2025.

**28. Washington v. Dep't of Education, No. 25-cv-01228, W.D. Wash.
(Mental Health Grants)**

This case, brought by a coalition of 16 states including California, challenges the Department of Education's termination of grants awarded through congressionally established school mental health funding programs, including roughly \$200 million awarded to 44 local education agencies, county offices of education, and universities in California. The grants have helped schools hire hundreds of psychologists, counselors, and social workers who have served thousands of students, including in the State's most economically disadvantaged and rural communities. By all markers, these programs are tremendously effective. The Department of Education awarded this funding to the nation's high-need, low-income, and rural schools pursuant to its Mental Health Service Professional Demonstration Grant Program and its School-Based Mental Health Services Grant Program. The complaint in this case was filed on June 30, 2025.

29. California v. Dep’t of Health and Human Services, No. 3:25-cv-05536, N.D. Cal.
(Medicaid Data Disclosure)

This litigation, advanced by a multistate coalition led by California, challenges the Department of Health and Human Services’s unsupported decision to provide unfettered access to individual personal health data to the Department of Homeland Security. California’s Medi-Cal program provides healthcare coverage for one out of three Californians, including more than two million noncitizens. Noncitizens include green card holders, refugees, individuals who hold temporary protected status, and Deferred Action for Childhood Arrival recipients. Not all noncitizens are eligible for federally funded Medi-Cal services, and so California uses state-only funds to provide a version of the Medi-Cal program to all eligible State residents, regardless of their immigration status. The transfer of data to the Department of Homeland Security is creating fear and confusion that will lead noncitizens and their family members to disenroll, or refuse to enroll, in emergency Medicaid for which they are otherwise eligible, leaving states and their safety net hospitals to foot the bill for federally mandated emergency healthcare services. The lawsuit, filed on July 1, 2025, asks the court to enjoin the Department of Health and Human Services from transferring personally identifiable Medicaid data to the Department of Homeland Security or any other federal agency, and to enjoin the Department of Homeland Security from using this data to conduct immigration enforcement.

30. New Jersey v. Bondi, No. 25-cv-01807, D. Md.
(Forced Reset Triggers)

This case involves the federal Bureau of Alcohol, Tobacco, and Firearms’ (ATF) plans to return thousands of forced reset triggers (FRTs) into communities across the United States. A semi-automatic firearm equipped with an FRT allows a shooter to engage in sustained rapid fire, similar to a fully automatic machine gun, so long as the trigger is held down. Although ATF previously classified FRTs as illegal machine guns, it has since signed a settlement agreement reverting that classification and agreed to return thousands of seized FRTs into communities across the United States. An influx of FRTs into California communities would harm public safety and increase costs to the State. The multistate lawsuit seeks to prevent the return of FRTs under the settlement, asserting that they are prohibited by federal law, which prohibits anyone from owning machine guns, including devices that convert semi-automatic firearms into machine guns. California joined this litigation on July 7, 2025.

31. California v. McMahon, No. 1:25-cv-000329, D.R.I.
(Department of Education funding cuts)

On behalf of 23 states and two governors, California is co-leading this action challenging the Department of Education’s funding freeze to six longstanding education programs. Impacted programs include education for migrant children and English learners; programs that promote effective classroom instruction, improve school conditions and the use of technology in the classroom; community learning centers that offer students a broad range of opportunities for academic and extracurricular enrichment; and adult education and workforce development efforts. In California, an estimated \$939 million in federal education funding is frozen. The multistate complaint and motion for preliminary injunction were both filed on July 14, 2025.

**32. Washington v. Federal Emergency Management Agency, No. 1:25-cv-12006, D. Mass
(FEMA Building Resilient Infrastructure and Communities funding termination)**

This action challenges the unlawful termination of the Federal Emergency Management Agency’s Building Resilient Infrastructure and Communities (BRIC) grant program. The BRIC program funds disaster preparedness projects, in order to mitigate the risks from disasters before they happen. With that funding, communities across the nation can invest in projects that reduce harm from natural disasters. This is particularly important in California—which faces the risks of wildfires, earthquakes, landslides, and flooding—and California is the largest beneficiary of this program. The multistate coalition filed this lawsuit on July 16, 2025.

**33. California v. Kennedy, No. 1:25-cv-12019, D. Mass.
(Affordable Care Act rulemaking)**

California is co-leading this multistate action challenging an unlawful final rule promulgated by the HHS and Centers for Medicare & Medicaid Services that would create significant barriers to obtaining healthcare under the Affordable Care Act (ACA). The final rule would make substantial changes to the operation of the ACA marketplaces, including adding new bureaucratic barriers, imposing an automatic monthly charge on all automatically reenrolled consumers who qualify for \$0 premiums, and shortening the open enrollment period for signing up for health coverage. The administration estimates that it will cause up to 1.8 million people to lose their health insurance, while causing millions more to pay increased insurance premiums and out-of-pocket costs like co-pays and deductibles. The final rule also excludes coverage of gender-affirming care as an essential health benefit under the ACA. It will significantly drive up the costs incurred by states in providing healthcare, including increasing state expenditures on Medicaid, uncompensated emergency care, and funding other services provided to newly uninsured residents. California has approximately two million ACA plan enrollees, the third highest of any state. The multistate coalition filed the complaint and motion for a preliminary injunction on July 17, 2025, seeking to prevent the challenged portions of the final rule from taking effect in their states before the August 25 effective date.

**34. New York v. Dep’t of Justice, No. 1:25-cv-00345, D.R.I.
(Public Benefit Programs)**

This multistate action challenges the federal government’s decision to restrict access to more than a dozen public benefit programs—such as Head Start, food pantries, mental health and substance use disorder programs, and shelters for at-risk youth and domestic violence survivors—based on immigration status. The decision is contrary to law as well as nearly three decades of federal practice. Since 1997, the federal government has interpreted the Personal Responsibility and Work Opportunity Reconciliation Act to permit states’ use of federal funds for certain programs that serve communities based on need regardless of immigration status. The action fails to provide notice and an opportunity to comment, is arbitrary and capricious, and contrary to law in violation of the Administrative Procedure Act, and fails to give the states “fair notice” as required under the Spending Clause. The multistate coalition filed this action and a motion for a protective order on July 21.

**35. California v. Dep’t of Agriculture, No. 3:25-cv-06310 N.D. Cal.
(SNAP Data Sharing)**

California is leading this multistate lawsuit challenging the U.S. Department of Agriculture’s (USDA) demand that states turn over personal and sensitive information about millions of Supplemental Nutrition Assistance Program (SNAP) recipients. SNAP is a federally funded, state-administered program that provides billions of dollars in food assistance to tens of millions of low-income families across the country. SNAP applicants provide their private information on the understanding, backed by long-standing state and federal laws, that their information will not be used for unrelated purposes. USDA has suggested that it could withhold administrative funding for the program if states fail to comply — effectively forcing states to choose between protecting their residents’ privacy and providing critical nutrition assistance to those in need. California receives roughly \$1 billion a year to administer the program. The lawsuit argues this demand violates multiple federal privacy laws and the U.S. Constitution. The lawsuit was filed on July 28, 2025.

**36. California v. Dep’t of Health and Human Services, No. 1:25-cv-12118 D. Mass
(Defunding Planned Parenthood)**

California leads this multistate lawsuit challenging the “Defund Provision” targeting Planned Parenthood in the sweeping federal budget reconciliation law (“Big Beautiful Bill”). The Defund Provision is a direct attack on the healthcare access of millions of low-income Americans, disproportionately affecting women, LGBTQ+ individuals, and communities of color. This provision specifically blocks Medicaid reimbursements for essential healthcare services provided at Planned Parenthood health centers, such as cancer screenings, birth control, and sexually transmitted infections testing. The lawsuit was filed on July 29, 2025.

C. Amicus Briefs

The Department has filed dozens of amicus briefs supporting plaintiffs in other litigation that challenges federal overreach. These briefs express California’s interests and explain the impacts to California of improper federal action. Like the affirmative litigation, the Department often files these briefs in the context of multistate action, thus maximizing our resources and leveraging interoffice collaboration.

The Department filed several briefs supporting the integrity of independent federal boards and commissions. The federal administration has taken action to dismantle boards, including firing members of the Consumer Financial Protection Board, National Labor Relations Board, Merit Systems Protection Board, and Federal Trade Commission. The amicus briefs have emphasized the need for independence of those commissioners to ensure that the boards’ work is done without partisan impact and consistent with their mission, including protecting consumers and ensuring labor rights.

The Department has filed many briefs supporting immigrants’ rights. This has included supporting refugee admissions and funding, temporary protected status for Venezuelans and Haitians, student visas, and funding for unaccompanied children. The briefs explain that immigrants are key contributors to our economy and communities, and the federal actions will separate families, damage communities, and endanger immigrants. Recently, California provided amicus support to the ACLU’s lawsuit challenging the Immigration and Customs Enforcement raids in Los Angeles, explaining that those actions have intimidated communities, scarred civil society, harmed local economies, and sown confusion and distrust that impedes local law enforcement.

The Department's amicus briefs have supported law firms that were targeted by the presidential administration for representing clients or taking cases that the president disagrees with, including WilmerHale, Jenner Block, and Susman Godfrey. Those briefs articulate the importance of bedrock rule of law principles as well as freedom of speech. They explain that, in order to do justice and allow courts to reach fair and reasoned decisions, attorneys must be able to take difficult cases, even with unpopular clients.

Similar to the affirmative litigation, the Department's amicus briefs have also supported challenges to federal reductions in force, including at Job Corps and the Department of Health and Human Services, and discussed the important work of those agencies in California. Likewise, the Department has filed amicus briefs challenging funding cuts, such as to USAID funding and environmental justice grants, explaining how impounding those funds deprives our universities of research funding and harms Californians.

In addition, the Department has filed amicus briefs in a broad variety of other topics, including threats to social security, fair housing, public broadcasting, and gender anti-discrimination rights.

D. Administrative and Public Action

Finally, the Department has also commented on proposed federal regulatory action, in order to ensure California's interests are considered in regulatory process. These comment letters have addressed environmental protection, including proposed regulations implementing the Endangered Species Act that would substantially narrow the scope of protections for endangered and threatened species. The Department also commented on a federal offshore drilling investigation, and the rollback of anti-discrimination regulations at the Department of Energy. It commented on the proposed restoration of firearm rights to potentially violent and dangerous people. The Department commented on the U.S. Department of Housing and Urban Development's (HUD) interim final rule that would limit HUD's duty to affirmatively further fair housing, and also commented on another a proposed HUD rule that would rollback fair housing regulations that prohibit discriminatory marketing and require owners of federally-assisted housing to target outreach to communities that otherwise might not have learned about those housing opportunities. The Department has opposed amendments to immigration regulations that would limit potential sponsorship for unaccompanied immigrant children and discourage sponsorship by sharing potential sponsors' immigration status information with immigration enforcement entities.

In the face of federal hostility to programs that encourage diversity, equity, and inclusion, the Department published guidance to help private sector organizations understand the continued viability and legality of diversity initiatives in the workplace. Similarly, it issued guidance regarding the legality and importance of environmental justice programs in response to executive orders and related actions from the federal administration.

III. OTHER REQUIRED REPORTING

A. Outside Counsel

The Department has not used any SBX1-1 allocated funds to contract with outside counsel for the purposes of legal representation in connection with any federal accountability matter.

B. Administrative Actions Under State Law

The Department understands “administrative action authorized under state law” to mean non-judicial acts specifically authorized under a California state statutory or regulatory provision that may “mitigate the impacts of actions taken by the federal government.” Although many State executive agencies have likely considered or taken such administrative action, the Department is not aware of any administrative actions within the meaning of SBX1-1 that the Department itself has undertaken in specific response to executive overreach by this federal administration.