

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

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STATE OF RHODE ISLAND; STATE OF  
NEW YORK; STATE OF HAWAI'I; STATE  
OF ARIZONA; STATE OF CALIFORNIA;  
STATE OF COLORADO; STATE OF  
CONNECTICUT; STATE OF DELAWARE;  
STATE OF ILLINOIS; STATE OF MAINE;  
STATE OF MARYLAND;  
COMMONWEALTH OF MASSACHUSETTS;  
PEOPLE OF THE STATE OF MICHIGAN;  
STATE OF MINNESOTA; STATE OF  
NEVADA; STATE OF NEW JERSEY; STATE  
OF NEW MEXICO; STATE OF OREGON;  
STATE OF VERMONT; STATE OF  
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; INSTITUTE OF  
MUSEUM AND LIBRARY SERVICES;  
KEITH E. SONDERLING, in his official  
capacity as Acting Director of the Institute of  
Museum and Library Services; MINORITY  
BUSINESS AND DEVELOPMENT AGENCY;  
MADIHA D. LATIF, in her official capacity as  
Deputy Under Secretary of Commerce for  
Minority Business Development; HOWARD  
LUTNICK, in his official capacity as Secretary  
of Commerce; FEDERAL MEDIATION AND  
CONCILIATION SERVICE; GREG  
GOLDSTEIN, in his official capacity as Acting  
Director of the Federal Mediation and  
Conciliation Service; OFFICE OF  
MANAGEMENT AND BUDGET; RUSSELL  
T. VOUGHT, in his official capacity as Director  
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

**NOTICE OF SUPPLEMENTAL FILING**

**NOTICE OF SUPPLEMENTAL FILING**

On April 17, an individual named Nate Cavanaugh, purporting to act “[u]nder the authority of Keith Sonderling, Acting Undersecretary of MBDA,” sent notices to recipients of MBDA grants informing them that their grants were being terminated effective April 17, 2025. It is our understanding that all preexisting grants were terminated pursuant to such notices, including grants to Plaintiff States. *See* Alex Doe 2nd Supp. Decl., Ex. 55.

Plaintiff States ask the Court to accept the attached as Exhibits 55 through 61 to supplement Plaintiff States’ record in support of their pending motion for a preliminary injunction.

Supplemental declarations are attached for Alex Doe, Exhibit 55; Bon Wikenheiser, Exhibit 56; and Monica Villalobos, Exhibit 57.

Exhibits 58 through 61 are termination notices related to grants described in declarations previously submitted:

- Exhibit 58, MB21OBD8020251 (University of Hawai‘i) (Hokoana Decl. ¶ 8, ECF 03-11)
- Exhibit 59, MB21OBD8050204 (University of Hawai‘i) (Deane Decl. ¶ 13, ECF 03-10)
- Exhibit 60, MB23OBD0340311 (Northern Great Lakes Initiatives) (Sangalli Decl. ¶ 14, ECF 03-20)

- Exhibit 61, MB23OBD0340314 (Hub and Skills for Rhode Island's Future) (Tanner Decl. ¶ 11, ECF 03-29)

April 17, 2025

Respectfully submitted,

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/s/ Natalya A. Buckler

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Attorney for Plaintiff State of Wisconsin

\*Applications for pro hac vice forthcoming

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I filed the within via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF System to counsel of record on this 17th day of April, 2025.

*/s/ Kaliko 'onālani D. Fernandes*

# EXHIBIT 55



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

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

Defendants.

C.A. No. 1:25-cv-128

**DECLARATION OF ALEX DOE**

Pursuant to 28 U.S.C. § 1746, I, Alex Doe, hereby declare as follows:

1. I am currently employed by the Minority Business Development Agency (MBDA). I am over the age of 18 and have personal knowledge of all the facts stated herein, except those matters stated upon information and belief; as to those matters, I believe them to be true.
2. I am submitting this declaration pseudonymously because I fear retaliation. But if the Court would like to know my name or job position, I would be willing to provide it ex parte and under seal.
3. This declaration supplements the declarations I submitted on April 3, 2025, and April 11, 2025, with information that I have learned since that date.
4. Earlier today, an individual named Nate Cavanaugh, purporting to act “[u]nder the authority of Keith Sonderling, Acting Undersecretary of MBDA,” sent notices to recipients of MBDA grants informing them that their grants were being terminated effective April 17, 2025. It is my understanding that all preexisting MBDA grants were terminated pursuant to such notices.

5. It is my understanding that Mr. Cavanaugh is an official at the Department of Government Efficiency (DOGE).

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 17, 2025.

\_\_\_\_\_  
/s/ Alex Doe  
Alex Doe

# EXHIBIT 56

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

STATE OF WISCONSIN; et al.,

Plaintiffs,

v.

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

Defendants.

C.A. No. 1:25-cv-128

**DECLARATION OF BON WIKENHEISER,**  
**EXECUTIVE DIRECTOR, OFFICE OF BUSINESS & ENTREPRENEURSHIP,**  
**UNIVERSITY OF WISCONSIN SYSTEM**

Pursuant to 28 U.S.C. § 1746, I, Bon M. Wikenheiser, hereby declare as follows:

1. I am a resident of Wisconsin. I am over the age of 18 and have personal knowledge of all the facts stated herein, except as to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. As Executive Director of the University of Wisconsin System Office of Business & Entrepreneurship (OBE), I have responsibility for administering OBE's funds, including Grant No. MB23OBD0340300, which OBE was awarded by the Minority Business Development Agency.

3. Attached to this declaration as **Exhibit A** is a true and correct copy of an email notice that my office received on April 17, 2025, from the Minority Business Development Agency.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on April 17, 2025, at Madison, Wisconsin.

A handwritten signature in black ink that reads "Bon M. Wikenheiser". The signature is written in a cursive style with a horizontal line underneath the name.

Bon M. Wikenheiser



**MINORITY BUSINESS DEVELOPMENT AGENCY**

**NOTICE OF GRANT TERMINATION**

April 17, 2025

Brenda Egan

baegan@rsp.wisc.edu

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB23OBD0340300) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

# EXHIBIT 57

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

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

Defendants.

C.A. No. 1:25-cv-00128-JJM-LDA

**SECOND SUPPLEMENTAL DECLARATION OF MONICA S. VILLALOBOS**

Pursuant to 28 U.S.C. § 1746, I, Monica S. Villalobos, declare as follows:

1. On April 17, 2025, the Arizona Hispanic Chamber of Commerce (AZHCC), which operates the Arizona MBDA Business Center (“the Center”), received a Notice of Grant Termination from the Minority Business Development Agency (“MBDA”), terminating its Grant No. MB23OBD0340294, effective the same day. On April 17, 2025, the Center also directly received a Notice of Grant Termination from the MBDA, terminating its Grant No. MB21OBD8050207, effective the same day.

2. The termination letters (“Letters”) were sent via email by Nate Cavanaugh ([ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)). The Letters were also electronically signed by Nate Cavanaugh followed by the words Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA.

3. Both Letters included the same explanation for the termination of the grants:

MBDA is repurposing its funding allocations in a new direction in furtherance of the President’s agenda. Independently and secondly, the President’s March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and



functions . . . . Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

4. The Letters immediately bring to fruition the feared detrimental consequences for Arizona and the closing of the Center and the cessation of related programs and services:

- a. The termination of Grant No. MB21OBD8050207 means that the Center has lost the anticipated \$400,000 disbursement expected on July 1, 2025, and the Center will need to cease operations on June 30, 2025.
- b. The closure of the Center also means that Arizona businesses will no longer have access to the services the Center has effectively provided since 1997, including the following:
  - i. Access to capital through facilitation of access to loans, working capital and lines of credit, loan packaging, and increase in bonding capacity;
  - ii. Access to markets through bid opportunities by subscribing to numerous bid databases and providing opportunities to clients;
  - iii. Capacity building through customized business consulting services, development of growth strategies, creating strong capability statements, certification assistance, teaming arrangements, and business mastery workshops;
  - iv. Market research; and
  - v. Export readiness assessments.
- c. As previously mentioned, these services are critical for the development of Minority Business Enterprises (MBEs) in Arizona, which have been historically disadvantaged in participating in the economy

- d. The termination of Grant No. MB23OBD0340294 takes away the \$3,000,000 over-four-years award to the AZHCC Foundation for the Capital Readiness Program (“CRP”). Without continuation of this funding, the AZHCC Foundation will not be able to provide services beyond this grant cycle and will cease to serve hundreds of clients and facilitate millions in access to capital.

5. As a result of the termination of Grant No. MB23OBD0340294 and Grant No. MB21OBD8050207, the AZHCC and the Center will have to terminate 10 employees today, without prior notice. The AZHCC and the Center also will have to release 20 contractors today, without prior notice.

6. It is my strong belief that the termination of these grants will have substantial immediate and long-term adverse economic consequences for Arizona and the numbers support my belief. The following is worth repeating:

- a. In fiscal year 2023-2024, the CRP served 769 clients and facilitated \$17,806,989 in access to capital.
- b. Between 2020 and 2024, the Center facilitated the procurement of contracts valued at a total of \$901,298,563, exceeding a goal of \$335,000,000.
- c. Between 2020 and 2024, the Center facilitated access to financing to a tune of \$60,546,880.
- d. Between 2020 and 2024, the Center facilitated the creation of 2,677 new jobs in Arizona, nearly doubling its goal of 1,353 new jobs.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct.

Executed on this 17th day of April, 2025, at Phoenix, Arizona.

A handwritten signature in black ink, appearing to read "M. Villalobos", with a long horizontal flourish extending to the right.

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Monica S. Villalobos, President and CEO  
Arizona Hispanic Chamber of Commerce  
Operator for the Arizona MBDA Business Center

**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Kaaren-Lyn Graves

kaareng@azhcc.com

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB23OBD0340294) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Alika Kumar

alikakumar@phoenixmbdacenter.com

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB21OBD8050207) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

# EXHIBIT 58

**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Nozomi Kanoho

aor@hawaii.edu

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB21OBD8020251) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

# EXHIBIT 59



**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Vassillis Syrmos

aor@hawaii.edu

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB21OBD8050204) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

# EXHIBIT 60

**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Natasha Koss

[nkoss@northerninitiatives.org](mailto:nkoss@northerninitiatives.org)

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB23OBD0340311) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230

# EXHIBIT 61

**MINORITY BUSINESS DEVELOPMENT AGENCY****NOTICE OF GRANT TERMINATION**

April 17, 2025

Nina Pande

npande@skillsforri.com

Dear MBDA Grantee,

This letter provides notice that the Minority Business Development Agency (MBDA) is terminating your federal grant (Grant No. MB23OBD0340314) effective April 17, 2025, in accordance with the termination clause in your Award Agreement.

Upon further review, MBDA has determined that your grant is unfortunately no longer consistent with the agency's priorities and no longer serves the interest of the United States and the MBDA Program. MBDA is repurposing its funding allocations in a new direction in furtherance of the President's agenda. Independently and secondly, the President's March 14, 2025 executive order mandates that the MBDA eliminate all non-statutorily required activities and functions. *See Continuing the Reduction of the Federal Bureaucracy*, E.O. 14238 (Mar. 14, 2025). Therefore, the MBDA hereby terminates your grant in its entirety effective April 17, 2025.

Please remember that your obligations under the Grant Agreement continue to apply. An audit may be conducted by MBDA after the termination of the agreement. Please contact [ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov) with only urgent questions. We wish you well.

Sincerely,

/s/ Nate Cavanaugh

Nate Cavanaugh

Under the Authority of Keith Sonderling, Acting Undersecretary of MBDA

[ncavanaugh@doc.gov](mailto:ncavanaugh@doc.gov)

1401 Constitution Ave NW, Washington, DC 20230