

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ROBERT F. KENNEDY HUMAN RIGHTS;
SOUTHERN BORDER COMMUNITIES
COALITION; URBAN JUSTICE CENTER,

Plaintiffs;

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; KRISTI NOEM, in her official
capacity as Secretary of Homeland Security,

Defendants.

Case No. 1:25-cv-1270-ACR

JOINT STATUS REPORT

The Parties file this joint status report in response to the Court’s May 23 Minute Order directing the Parties “to provide confirmation that the job vacancies can be posted.”

Defendants’ Position

Since the Reduction-in-Force took effect on Friday May 23, the Offices are free to create new positions and seek applicants. There are no barriers to this process. The Offices have already begun expediting the creation of new positions so that they can be posted through the Office of the Chief Human Capital Officer (OCHCO). The following steps have been taken:

1. CRCL

- The Office has posted solicitations for detailees on DHS’ intranet.

- The Office has identified Position Descriptions for restaffing. These descriptions will be modified by Human Resources for the specific Office. Once approved, Job Announcements will be drafted and then posted for every vacancy at once. The postings are expected this week.

2. OIDO

- The Office has posted solicitations for detailees on DHS' intranet.
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3. CISOMB

- The Office posted solicitations for detailees on DHS' intranet last week. Three highly qualified candidates have applied so far with their supervisors' permission.
- The Position Description for the Deputy CIS Ombudsman has been approved and a Job Announcement should be posted soon.
- The Job Announcements are in progress for the Office.

Plaintiffs' Position

Plaintiffs do not have information sufficient to know whether it is true that job announcements and postings "are expected this week" or "should be posted soon." Plaintiffs are concerned that Defendants' update lacks both the specificity and the urgency that the circumstances require. Further, Plaintiffs remain concerned that, as of May 27, as Defendants concede, adequate staff are not currently in place to

perform the statutory functions of the three offices. That statutorily mandated performance ceased on March 21, when Defendants ordered nearly all of the DHS Oversight Offices' employees to cease work, leading Plaintiffs to file this action.

Dated: May 27, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on May 27, 2025, a true and correct copy of the foregoing document was electronically filed via the Court's CM/ECF system which sends notice of electronic filing to all counsel of record.

s/Tiberius Davis

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