

Exhibit A

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24 UNITED STATES DISTRICT COURT
25 FOR THE NORTHERN DISTRICT OF CALIFORNIA
26 SAN FRANCISCO DIVISION

27 AMERICAN FEDERATION OF
28 GOVERNMENT EMPLOYEES, AFL-CIO;
AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO; SERVICE EMPLOYEES
INTERNATIONAL UNION, AFL-CIO;
AFGE LOCAL 1122; AFGE LOCAL 1236;
AFGE LOCAL 2110; AFGE LOCAL 3172;
SEIU LOCAL 521; SEIU LOCAL 1000; SEIU
LOCAL 1021; ALLIANCE FOR RETIRED
AMERICANS; AMERICAN GEOPHYSICAL
UNION; AMERICAN PUBLIC HEALTH
ASSOCIATION; CENTER FOR TAXPAYER
RIGHTS; COALITION TO PROTECT
AMERICA'S NATIONAL PARKS;
COMMON DEFENSE CIVIC
ENGAGEMENT; MAIN STREET

Case No. 3:25-cv-03698-SI

**SECOND SUPPLEMENTAL COMPLAINT
FOR DECLARATORY AND INJUNCTIVE
RELIEF**

1 ALLIANCE; NATURAL RESOURCES
2 DEFENSE COUNCIL, INC.; NORTHEAST
3 ORGANIC FARMING ASSOCIATION,
4 INC.; VOTEVETS ACTION FUND INC.;
5 WESTERN WATERSHEDS PROJECT;
6 COUNTY OF SANTA CLARA,
7 CALIFORNIA; CITY OF CHICAGO,
8 ILLINOIS; MARTIN LUTHER KING, JR.
9 COUNTY, WASHINGTON; HARRIS
10 COUNTY, TEXAS; CITY OF BALTIMORE,
11 MARYLAND; CITY AND COUNTY OF
12 SAN FRANCISCO, CALIFORNIA;
13 AMERICAN FOREIGN SERVICE
14 ASSOCIATION; NATIONAL WIC
15 ASSOCIATION; ALLIANCE OF CROP,
16 SOIL AND ENVIRONMENTAL SCIENCE
17 SOCIETIES; AND PRINCE GEORGE'S
18 COUNTY, MARYLAND

19 Plaintiffs,

20 v.

21 DONALD J. TRUMP, in his official capacity
22 as President of the United States;
23 UNITED STATES OFFICE OF
24 MANAGEMENT AND BUDGET;
25 RUSSELL VOUGHT, in his official capacity
26 as Director of U.S. Office of Management and
27 Budget;
28 UNITED STATES OFFICE OF PERSONNEL
MANAGEMENT;
SCOTT KUPOR, in his official capacity as
Director of the U.S. Office of Personnel
Management;
UNITED STATES DOGE SERVICE;
AMY GLEASON, in her official capacity as
Acting Administrator of the U.S. DOGE
Service;
UNITED STATES DEPARTMENT OF
AGRICULTURE;
BROOKE ROLLINS, in her official capacity
as Secretary of the U.S. Department of
Agriculture;
UNITED STATES DEPARTMENT OF
COMMERCE;
HOWARD LUTNICK, in his official capacity
as Secretary of the U.S. Department of

1 Commerce;
2 UNITED STATES DEPARTMENT OF
3 DEFENSE;
4 PETE HEGSETH, in his official capacity as
5 Secretary of the U.S. Department of Defense;
6 UNITED STATES DEPARTMENT OF
7 ENERGY;
8 CHRIS WRIGHT, in his official capacity as
9 Secretary of the U.S. Department of Energy;
10 UNITED STATES DEPARTMENT OF
11 HEALTH AND HUMAN SERVICES;
12 ROBERT F. KENNEDY JR., in his official
13 capacity as Secretary of the U.S. Department
14 of Health and Human Services;
15 UNITED STATES DEPARTMENT OF
16 HOMELAND SECURITY;
17 KRISTI NOEM, in her official capacity as
18 Secretary of the U.S. Department of Homeland
19 Security;
20 UNITED STATES DEPARTMENT OF
21 HOUSING AND URBAN DEVELOPMENT;
22 SCOTT TURNER, in his official capacity as
23 Secretary of the U.S. Department of Housing
24 and Urban Development;
25 UNITED STATES DEPARTMENT OF
26 JUSTICE;
27 PAM BONDI, in her official capacity as
28 Attorney General of the U.S. Department of
Justice;
UNITED STATES DEPARTMENT OF THE
INTERIOR;
DOUG BURGUM, in his official capacity as
Secretary of the U.S. Department of the
Interior;
UNITED STATES DEPARTMENT OF
LABOR;
LORI CHAVEZ-DEREMER, in her official
capacity as Secretary of the U.S. Department
of Labor;
UNITED STATES DEPARTMENT OF
STATE;
MARCO RUBIO, in his official capacity as
Secretary of the U.S. Department of State;
UNITED STATES DEPARTMENT OF
TREASURY;
SCOTT BESSANT, in his official capacity as
Secretary of U.S. Department of Treasury;
UNITED STATES DEPARTMENT OF

1 TRANSPORTATION;
2 SEAN DUFFY, in his official capacity as
3 Secretary for the U.S. Department of
4 Transportation;
5 UNITED STATES DEPARTMENT OF
6 VETERANS AFFAIRS;
7 DOUG COLLINS, in his official capacity as
8 Secretary of Veterans Affairs;
9 AMERICORPS (a.k.a. the CORPORATION
10 FOR NATIONAL AND COMMUNITY
11 SERVICE);
12 JENNIFER BASTRESS TAHMASEBI, in her
13 official capacity as Interim Agency Head of
14 AmeriCorps;
15 UNITED STATES ENVIRONMENTAL
16 PROTECTION AGENCY;
17 LEE ZELDIN, in his official capacity as
18 Administrator of U.S. Environmental
19 Protection Agency;
20 UNITED STATES GENERAL SERVICES
21 ADMINISTRATION;
22 MICHAEL RIGAS, in his official capacity as
23 Acting Administrator for U.S. General
24 Services Administration;
25 NATIONAL LABOR RELATIONS BOARD;
26 DAVID M. PROUTY, in his official capacity
27 as Member of the National Labor Relations
28 Board;
WILLIAM COWEN, in his official capacity as
the Acting General Counsel of the National
Labor Relations Board;
NATIONAL SCIENCE FOUNDATION;
BRIAN STONE, in his official capacity as
Acting Director of the National Science
Foundation;
PEACE CORPS;
PAUL SHEA, in her official capacity as Chief
Executive Officer of the Peace Corps;
UNITED STATES SMALL BUSINESS
ADMINISTRATION;
KELLY LOEFFLER, in her official capacity
as Administrator of the U.S. Small Business
Administration;
UNITED STATES SOCIAL SECURITY
ADMINISTRATION;
FRANK BISIGNANO, in his official capacity
as Commissioner of the U.S. Social Security
Administration;

1 FEDERAL EMERGENCY MANAGEMENT
2 AGENCY; and
3 KAREN EVANS, in her official capacity as
4 the Senior Official Performing the Duties of
5 FEMA Administrator,

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Defendants.

INTRODUCTION

608. Pursuant to Federal Rule of Civil Procedure 15(d), this filing supplements Plaintiffs' operative September 29, 2025 Second Amended Complaint ("SAC") and January 30, 2026 Supplemental Complaint ("First Supp. Complaint") by alleging facts pertinent to Plaintiffs' existing claims that have occurred after the filing of the SAC and First Supplemental Complaint, and by asserting additional claims challenging such later and ongoing actions by Defendants United States Department of Agriculture ("USDA") and USDA Secretary Brooke Rollins to dramatically reorganize and reduce the size of USDA, including through the continued implementation of the workforce reduction directives of Defendants President Trump, the Office of Management and Budget ("OMB") and the Office of Personnel Management ("OPM") previously challenged in this case.

609. During the time that this litigation has been pending, pursuant to the directives of President Trump, OMB, and OPM, USDA created and received approval for an Agency RIF and Reorganization Plan that would impose substantial restructuring and workforce reduction across the Department ("Reorganization Plan"). USDA later announced aspects of this Reorganization Plan to the public, but delayed implementing action until 2026.

610. In spring 2026, USDA began taking action to implement its Reorganization Plan that will restructure and downsize the agency across many different mission areas and component agencies, including but not limited to the U.S. Forest Service, the Food and Nutrition Administration ("FNA," formerly known as the Food and Nutrition Service), Agricultural Research Service, Economic Research Service, National Institute of Food and Agriculture, Foreign Agricultural Service, and the USDA's Farm Preservation and Conservation and Rural Development mission areas.

611. USDA's Reorganization Plan and implementing actions have harmed and will continue to harm USDA employees impacted by the restructuring and downsizing, including employees represented by Union Plaintiffs, local governments that rely on the services, research, and other functions of this agency including Local Government Plaintiffs, and non-profit organizations

1 and their members who similarly rely on the services and functions of this agency, including Plaintiff
2 Organizations.

3 Plaintiffs therefore hereby plead as follows:

4 **SUPPLEMENTAL PARTIES**

5 612. Plaintiff National WIC Association (“NWA”) is a 501(c)(3) non-profit membership-
6 based organization. “WIC” stands for Special Supplemental Nutrition Program for Women, Infants,
7 and Children, which is a program created by Congress and administered by Defendant USDA. NWA
8 represents well over 10,000 WIC professionals nationwide, including staff at state, tribal, and local
9 WIC agencies, as well as WIC clinic staff. NWA’s mission is to provide its members with support,
10 tools, and leadership to expand and sustain effective nutrition services for mothers and young
11 children. NWA has served as the national non-profit advocacy voice and education arm of WIC for
12 more than 40 years. NWA also serves as a voice for all WIC agencies and their staff in advocating
13 for sufficient resources, program improvements, robust infrastructure, and sound knowledge
14 management to serve the nearly 7 million mothers and young children participating in WIC. NWA is
15 added as a plaintiff to claims in this Second Supplemental Complaint, on its own behalf and on behalf
16 of its members.

17 613. Plaintiff Alliance of Crop, Soil and Environmental Science Societies (“the Alliance”) is a 501(c)(3) non-profit organization that manages and supports three membership associations: the
18 American Society of Agronomy, Crop Science Society of America, and Soil Science Society of
19 America. These Science Societies have approximately 7,500 members, including employees of the
20 U.S. Department of Agriculture and other scientific contributors in university, non-profit, and
21 industry settings. The Alliance works to advance the fields of agriculture, food, environment, and
22 natural resources, in part by facilitating collaboration amongst and bolstering communication
23 between agronomic, crop, and soil professionals, in order to grow science-based knowledge in these
24 fields. The Alliance is added as a plaintiff to claims in this Second Supplemental Complaint, on
25 behalf of its Societies’ members.
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1 614. Plaintiff Prince George’s County, Maryland is the second-most populous county in the
2 state of Maryland and, due to its proximity to Washington, D.C., hosts many federal government
3 facilities. Prince George’s County is home to the Beltsville Agricultural Research Center (“BARC”),
4 a unit of USDA’s Agricultural Research Service. BARC is the largest and most diversified
5 agricultural research complex in the world, and spans some 6,600 acres of land in Prince George’s
6 County, with operations that have a substantial and beneficial impact on the County. Prince George’s
7 County is added as a plaintiff to claims in this Second Supplemental Complaint.

8 **SUPPLEMENTAL FACTUAL ALLEGATIONS**

9 615. In 2025, pursuant to the President’s directives in Executive Order 14210 and
10 implementing OMB/OPM Memorandum, USDA created and submitted a two-phase ARRP to OMB
11 and OPM for approval, and received that approval. Aspects of USDA’s ARRP were announced to the
12 public in July 2025. Secretary Rollins issued a Memorandum regarding USDA’s Reorganization
13 Plan, which includes significant forced relocations for USDA employees, as USDA restructures its
14 component agencies and programs.

15 616. USDA invited public comment on the Secretary’s description of the Reorganization
16 Plan and received overwhelmingly negative comments opposing the actions USDA set forth in the
17 Secretary Memorandum. USDA sought authorization for the actions in this Reorganization Plan
18 through the budget process for Fiscal Year 2026, which Congress rejected. Congress specifically
19 directed USDA *not* to take actions restructuring the agency or downsizing staff without further
20 congressional approval. USDA was also blocked from implementing further workforce reduction
21 efforts through injunctions and acts of Congress throughout 2025 and well into 2026.

22 617. USDA delayed implementation of the Reorganization Plan until 2026. In late spring,
23 USDA began releasing public information regarding reorganization implementation at component
24 mission areas and agencies. Those actions include forcing large numbers of USDA employees
25 currently working in the Washington, D.C. area to relocate to new “hub” locations throughout the
26 country, as well as other forced relocations from regional and other offices of the various USDA
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1 component agencies and programs. USDA's intended purpose in taking these actions is to cause
2 large-scale workforce reduction, despite USDA's public denial of that purpose or effect of its Plan.

3 618. USDA's Reorganization Plan intends to minimize or eliminate programs and offices
4 that perform functions that the Trump Administration perceives as contrary to the President's policy
5 priorities, without obtaining congressional approval. These actions will adversely impact USDA's
6 capacity to perform the functions delegated to it by Congress. USDA is currently implementing this
7 Plan through the rollout of forced relocations of employees across the agency, and further
8 implementing action is imminent.

9 619. USDA's actions will harm existing Plaintiffs, including Plaintiffs American Federation
10 of Government Employees ("AFGE") and American Federation of State County and Municipal
11 Employees ("AFSCME"), which represent impacted USDA employees, as well as Plaintiffs Western
12 Watersheds Project, Coalition to Protect America's National Parks, Natural Resources Defense
13 Council ("NRDC"), American Geophysical Union, County of Santa Clara, Martin Luther King, Jr.
14 County ("King County"), City of Baltimore, Harris County, and City and County of San Francisco,
15 all of which are impacted by the actions USDA is taking to implement the Reorganization Plan and
16 the resulting impact on agency services and functions.

17 620. Plaintiffs AFGE and AFSCME each represent and have as members federal employees
18 who work for USDA and will be impacted by Defendants' implementation of the Administration's
19 workforce reduction actions at issue in this litigation. The employees represented by AFGE and
20 AFSCME include USDA employees who will be separated from employment as a result of USDA's
21 forced relocation and other restructuring actions. Upon separation, these federal employees will lose
22 their income, health benefits, and other incidents of employment, causing severe irreparable harm to
23 them, their families, and their communities. Many of these employees are longtime employees of the
24 federal government and/or their agency and will lose not only their current job but a career that has
25 been years in the making.

26 621. Plaintiff AFGE and AFSCME also represent and have as members federal employees
27 who work at the USDA and who, if they keep their job, will have to work in offices, roles, and
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1 functions that will be adversely affected by the USDA's actions implementing the Reorganization
2 Plan, making their jobs immensely more difficult. Each federal employee who remains will be
3 required to do more to try to meet the agency's statutory mission and obligations, without the support
4 of colleagues who have been separated as a result of USDA's actions at issue in this lawsuit.

5 622. These actions have and will continue to harm Plaintiff AFGE's and AFSCME's core
6 function of representing employees and providing counseling, advice, and representation to
7 employees in the event of adverse employment actions. Plaintiff AFGE and AFSCME have already
8 expended, and will continue to expend, substantial time and resources as a result of USDA's
9 Reorganization Plan, addressing employee concerns regarding these actions and attempting to
10 provide employees with effective representation. The unions have been forced to divert resources
11 that would be devoted to representing employees who have, will, or may experience adverse
12 employment actions and/or other representational work. The unions are also harmed by the actual
13 and imminent termination of their members employed USDA, including by the loss of dues income.

14 623. Local Government Plaintiffs County of Santa Clara, California; King County,
15 Washington; Harris County, Texas; City of Baltimore, Maryland; and City and County of San
16 Francisco, California have suffered and/or will imminently suffer actual and ongoing harm as a result
17 of USDA actions at issue in this litigation, including the ongoing and imminent forced relocation of
18 USDA employees and attendant workforce attrition, which will result in delays and reduction in
19 services provided by USDA on which they rely. For instance, these Local Government Plaintiffs rely
20 on services provided by the FNA to administer food benefit programs to low-income residents in their
21 jurisdictions, as well as on the Forest Service's public lands management and fire response and
22 prevention, and they will incur additional burdens, expenses, and other harms if the reorganization
23 impairs those services. *See also* SAC ¶¶299-307. These Local Government Plaintiffs are adversely
24 affected by the elimination of any positions at USDA within their geographic borders, as well as
25 across the country because USDA employees located outside Plaintiffs' geographic boundaries
26 provide services and functions to Plaintiffs.

1 624. Organization Plaintiffs Western Watersheds Project, The Coalition to Protect America's
2 National Parks, NRDC, American Geophysical Union, and their members have suffered or will
3 imminently suffer actual and ongoing harm as a result of USDA actions at issue in this litigation,
4 including the ongoing and imminent forced relocation of USDA employees, which will result in
5 delays and reduction in services provided by USDA on which they rely. Those Plaintiffs and/or their
6 members rely on scientific research, funding, or collaboration from USDA research agencies that are
7 being reorganized, including the Agricultural Research Service, Forest Service, National Institute of
8 Food and Agriculture, National Agricultural Statistics Service, and Natural Resources Conservation
9 Service, and those Plaintiffs' and their members' scientific, advocacy, and other core business
10 activities will be impaired by the attrition of USDA researchers and decrease in research and grant
11 administration capacity caused by the reorganization. Many members of Western Watersheds Project,
12 The Coalition to Protect America's National Parks, Natural Resources Defense Council live near or
13 recreate in national forests or parks, and their ability to visit and enjoy those lands will be impaired
14 by the reorganization's diminution of the Forest Service's capacity to sustainably manage national
15 forests and engage in fire response and prevention efforts. *See also* SAC ¶¶299-307. Plaintiff
16 Organizations are being adversely impacted by USDA's reorganization across the country and the
17 harms caused are and will not be limited to a defined and particular geographic area.

18 625. USDA's actions will also harm the new Plaintiffs who also bring claims in this Second
19 Supplemental Complaint.

20 626. Plaintiff NWA and its members will suffer actual and substantial harm as a result of
21 USDA's reorganization, in particular from the actions being taken to restructure and downsize the
22 FNA. NWA's members are employees of state, tribal, and local WIC agencies that rely upon FNA for
23 operational funding, benefits funding, program implementation, technical assistance, program
24 integrity guidance and review, and policy guidance in order to deliver WIC services to mothers and
25 children in their communities. FNA staff are critical to the process of allocating funding to WIC
26 agencies in a timely manner, monitoring WIC state agencies' funding stability in case of unexpected
27 costs, and responding to unexpected shortfalls, which can happen with little warning and require
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1 swift action. The actions to restructure FNA, including the forced relocation of staff, will result in
2 wide-scale staff departures. These actions will disrupt FNA services and funding for state, local, and
3 tribal agencies and other organizations, including the operational funding for agencies and entities
4 that employ NWA's members. The resulting funding gaps will put NWA members at risk of
5 furloughs or other adverse employment consequences. NWA will also suffer organizational harm
6 because it relies on FNA staff to administer a cooperative agreement that funds NWA staff salaries,
7 which NWA will struggle to cover if FNA staff departures cause delays in payments under the
8 agreement. NWA will suffer further organizational harm because, as FNA's capacity degrades,
9 NWA's members will turn to NWA for help bridging gaps in technical assistance and program
10 implementation. This increase in member needs will force NWA to divert resources from its other
11 core activities that are central to its mission.

12 627. Plaintiff Alliance and its members will also suffer actual and ongoing harm as a result
13 of USDA's Reorganization. Plaintiff Alliance's member societies have as members federal
14 employees who work for USDA, including at the Agricultural Research Service, the Beltsville
15 Agricultural Research Center, the Natural Resources Conservation Service, the Forest Service, and
16 the National Institute of Food and Agriculture. Many of these members will be required to relocate,
17 and if they are unable to do so, they will be involuntarily separated and thus will lose their income,
18 health benefits, and other incidents of employment, causing severe irreparable harm to them and their
19 families. Many of these employees are longtime scientists at their agencies, and separation means
20 losing a career that has been years in the making and leaving behind ongoing research. Other
21 Alliance members who rely on USDA for funding and who collaborate with USDA scientists on
22 research projects will also be harmed by the attrition and mission disruption that the Reorganization
23 will cause at the agencies. For example, they will experience delays in the awarding and/or
24 overseeing funding from the National Institute of Food and Agriculture and the Natural Resources
25 Conservation Service, disrupting their ability to continue ongoing and start new research, and lose
26 collaborators at the Agricultural Research Service, including at the Beltsville Agricultural Research
27 Center, which is being decommissioned. All these impacts to members will also harm the Alliance's
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1 ability to fulfill its mission of advancing knowledge and facilitating collaboration in the fields of
2 agronomy, crop science, and soil science.

3 628. Plaintiff Prince George's County, Maryland will suffer injury when USDA closes
4 BARC and vacates its 6,600-acre campus. BARC has been a hub of innovation and collaboration in
5 Prince George's County for over a century, drawing in top agricultural scientists and contributing to
6 the County's economy, identity and culture. A significant portion of the County's economy depends
7 on BARC's presence. The County will lose substantial tax revenue if BARC and its employees are
8 relocated. The County also relies on USDA's environmental remediation work on Superfund sites at
9 BARC, including BARC's work to clean and maintain Indian Creek, a major tributary of the
10 Anacostia River, which runs through BARC's campus and connects with neighboring lands owned
11 and maintained by Prince George's County. Without BARC's care and maintenance of the wetlands
12 on its campus, the County will be forced to expend additional resources and incur additional costs,
13 which will be significant.

14 SUPPLEMENTAL CLAIMS FOR RELIEF

15 Claim XIV

16 **Administrative Procedure Act, 5 U.S.C. §706(2)(A), (B), and (C)** 17 **Against Defendants USDA Secretary Rollins and USDA** **(Action Not in Accordance with Law and Exceeding Statutory Authority)**

18 629. Plaintiffs incorporate by reference all preceding paragraphs, the Second Amended
19 Complaint, and the First Supplemental Complaint as if fully set forth herein.

20 630. Under the APA, a court must "hold unlawful and set aside agency action" that is "not
21 in accordance with law," "contrary to constitutional right, power, privilege, or immunity," or "in
22 excess of statutory jurisdiction, authority, or limitations, or short of statutory right." 5 U.S.C.
23 §§706(2)(A), (B), and (C).

24 631. USDA is an agency subject to the APA. 5 U.S.C. §701.

25 632. The USDA Reorganization Plan and actions to implement that Plan are final agency
26 actions for the purposes of APA review.

27 633. The USDA Reorganization Plan and actions to implement that Plan are contrary to law
28 and exceed any statutory authority granted to USDA, including by:

- a. Exceeding any authority granted to USDA to reorganize the structure or downsize the staff of USDA;
- b. violating Congress's express prohibition of reorganization and downsizing authority;
- c. violating USDA's statutory requirements and duties set forth in the agency's authorizing statutes; and
- d. thereby usurping Congress's Article I legislative authority and violating the separation of powers principles embodied in the U.S. Constitution.

634. The actions of USDA Secretary Rollins and USDA therefore violate the Administrative Procedure Act because they are inconsistent with law in violation of 5 U.S.C. §706(2)(A), contrary to the Constitution in violation of 5 U.S.C. §706(2)(B), and exceed statutory authority in violation of 5 U.S.C. §706(2)(C).

Claim XV
Ultra Vires Unlawful and Unconstitutional Governmental Action
Against Defendants USDA Secretary Rollins and USDA

635. Plaintiffs incorporate by reference all preceding paragraphs, the Second Amended Complaint and the First Supplemental Complaint as if fully set forth herein.

636. Plaintiffs have a non-statutory right of action to enjoin and declare unlawful official action that is *ultra vires*.

637. The USDA Reorganization Plan and actions to implement that Plan are contrary to law and exceed any statutory authority granted to USDA, including by:

- a. exceeding any authority granted to USDA to reorganize the structure or downsize the staff of USDA;
- b. violating Congress's express prohibition of reorganization and downsizing authority;
- c. violating USDA's statutory requirements and duties set forth in the agency's authorizing statutes; and
- d. thereby usurping Congress's Article I legislative authority and violating the separation of powers principles embodied in the U.S. Constitution.

638. The actions of USDA Secretary Rollins and USDA therefore exceed authority and are contrary to statute and the Constitution and are therefore *ultra vires*.

Claim XVI
Administrative Procedure Act, 5 U.S.C. §706(2)(A)
Against Defendants USDA Secretary Rollins and USDA
(Arbitrary and Capricious Agency Action)

639. Plaintiffs incorporate by reference all preceding paragraphs, the Second Amended Complaint, and the First Supplemental Complaint as if fully set forth herein.

640. The APA requires that a court “hold unlawful and set aside agency action, findings, and conclusions found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. §706(2)(A).

641. The APA requires that an agency provide “a satisfactory explanation for its action[,] including a rational connection between the facts found and the choice made.” *Motor Vehicle Mfrs. Ass’n of the U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983) (internal quotation marks omitted). An action is also arbitrary and capricious if the agency “failed to consider . . . important aspects of the problem” before it, *Dep’t of Homeland Sec. v. Regents of the Univ. of California*, 591 U.S. 1, 25 (2020) (quoting *Motor Vehicle Mfrs.*, 463 U.S. at 43), “or offers an explanation for its decision that runs counter to the evidence before the agency,” *Center for Biological Diversity v. U.S. Fish and Wildlife Serv.*, 67 F.4th 1027, 1035 (9th Cir. 2023) (quoting *State Farm*, 463 U.S. at 43).

642. The USDA Reorganization Plan and actions to implement that Plan rely on public justifications and rationales that are contrary to the agency’s admissions and evidence before the agency; have been undertaken without considering the necessarily relevant and important aspects of the issue and without considering USDA’s needs, statutory mandates, or the reliance interests of affected employees and those relying on USDA services; and without any rational connection between the actions taken and the reasons given (or lack thereof), and are therefore arbitrary and capricious final agency actions.

643. The actions of USDA and USDA Secretary Rollins therefore violate the APA because they are arbitrary and capricious under 5 U.S.C. §706(2)(A).

SUPPLEMENTAL PRAYER FOR RELIEF

Wherefore, Plaintiffs pray that this Court:

644. Declare that Defendants USDA Secretary Rollins and USDA have exceeded statutory authority and acted contrary to statutory law and the Constitution, and acted in an unlawful arbitrary and capricious manner by and through the USDA Reorganization Plan and actions implementing that Plan, including by workforce reduction actions including the forced relocation of USDA employees.

645. Preliminarily and permanently enjoin, vacate, hold unlawful, set aside, and/or stay the USDA Reorganization Plan and any and all actions implementing that Plan, including under 5 U.S.C. §§705 and 706.

DATED: July 1, 2026

Respectfully submitted,

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