IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DEMOCRACY FORWARD FOUNDATION,
P.O. Box 34553
Washington, D.C. 20043,

Plaintiff,

vs.

U.S. OFFICE OF PERSONNEL
MANAGEMENT
1900 E Street NW
Washington, DC 20415

GENERAL SERVICES ADMINISTRATION
1800 F Street NW
Washington, DC 20405

U.S. DEPARTMENT OF HOUSING AND
URBAN DEVELOPMENT
451 7th St SW
Washington, DC 20410

OFFICE OF MANAGEMENT AND BUDGET
725 17th St NW
Washington, DC 20503

Defendants.

Case No. 25-cv-3517

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation ("DFF") brings this action against Defendants

U.S. Office of Personnel Management ("OPM"), the General Services Administration ("GSA"),

U.S. Department of Housing and Urban Development ("HUD"), and the Office of Management

and Budget ("OMB") to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552

("FOIA"). Plaintiff alleges as follows:

Jurisdiction and Venue

1.   This Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

2.   Venue is proper under 28 U.S.C. § 1391(e), as Defendants' headquarters are located in Washington, D.C., within this district, and a substantial part of the events or omissions giving rise to Plaintiff's claims occurred here.

Parties

3.   Plaintiff Democracy Forward Foundation ("DFF") is a not-for-profit organization incorporated under the laws of the District of Columbia and based in Washington, D.C. Plaintiff works to promote transparency and accountability in government, in part, by educating the public on government actions and policies.

4.   Defendant OPM is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. OPM has possession, custody, and control of records to which Plaintiff seeks access.

5.   Defendant GSA is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. GSA has possession, custody, and control of records to which Plaintiff seeks access.

6.   Defendant HUD is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. HUD has possession, custody, and control of records to which Plaintiff seeks access.

7.   Defendant OPM is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. OPM has possession, custody, and control of records to which Plaintiff seeks access.

Facts

8.   The Trump-Vance Administration has reportedly been pursuing a deregulation agenda supported by the use of artificial intelligence ("AI").[1]

9.   According to public records released to DFF and public reports, GSA has taken a central role in the deregulatory agenda, including by providing agencies with a document "Policy Playbook Review: A guide for agency policy reviews to ensure alignment to Trump Administration priorities,"[2] rolling out an artificial intelligence evaluation suite that enables federal agencies to experiment with and adopt artificial intelligence at scale,[3] and, alongside OMB, making recommendations on removing federal regulations and rules.[4]

10.   OMB has presented the development and rollout of the SweetREX Regulation AI Plan Builder, a program developed by affiliates of the Department of Government Efficiency ("DOGE") working out of HUD, which is meant to expedite the process for reviewing and updating regulations.[5]

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[1] *See, e.g.*, David Gilbert et al., *DOGE put a college student in charge of using AI to rewrite regulations*, Wired (Apr. 30, 2025), https://www.wired.com/story/doge-college-student-ai-rewrite-regulations-deregulation/ (reporting "A DOGE operative has been tasked with using AI to propose rewrites to the Department of Housing and Urban Development's regulations—an effort sources are told will roll out across government").

[2] *Email from Jennifer Burch, Deputy Chief of Staff at the Dep't of Veterans Affs., to Peter Kasperowicz, Christopher Syrek, & Curtis Cashour* (Apr. 17, 2025), https://democracyforward.org/wp-content/uploads/2025/09/Emails-re-Policy-Playbook-Review.pdf.

[3] U.S. Gen. Servs. Admin., *GSA Launches USAi to Advance White House "America's AI Action Plan"* (Aug. 14, 2025), https://www.gsa.gov/about-us/newsroom/news-releases/gsa-launches-usai-to-advance-white-house-americas-ai-action-plan-08142025.

[4] Caroline Nihill, *Trump administration launches online public deregulation form,* FedScoop (Apr. 16, 2025), https://fedscoop.com/trump-administration-launches-online-public-deregulation-form/.

[5] Andrew Couts, *A DOGE AI Tool Called SweetREX Is Coming to Slash US Government Regulation,* Wired (Aug. 14, 2025), https://www.wired.com/story/sweetrex-deregulation-ai-us-government-regulation-doge/.

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11.   Meanwhile, OPM Director Scott Kupor suggested using AI to summarize comments on proposed rules and regulations.[6]

12.   DFF filed several FOIA requests to shed light on the extent and character of the Trump-Vance Administration's use of AI in deregulation efforts. The rules that protect the health, safety, wages, and rights of millions of Americans could be impacted by novel approaches that reduce officials' and expert employees' level of involvement in the deregulation process.

OPM Guidance and Communications Request (25-HQ-2031-F)

13.   On June 30, 2025, DFF sent a FOIA request to OPM seeking the following:

1.   All final guidance, policy or enforcement memoranda, directives, or rules documents sent or received by OPM related to the use of artificial intelligence to analyze or respond to comments received in regulations.gov.

2.   All final guidance, policy or enforcement memoranda, directives, or rules documents sent or received by OPM related to the use of artificial intelligence in rulemaking, including, but not limited to, using artificial intelligence to write portions or the entirety of rules or regulations.

3.   All email communications concerning the use of artificial intelligence to analyze or otherwise review comments submitted in response to OPM's proposed rule on "Improving Performance, Accountability and Responsiveness in the Civil Service," which may also be referred to as "Schedule Policy/Career," "Schedule P/C," or "Schedule F," sent or received by OPM officials Noah Peters, Brian Bjelde, Nikhil Rajpal, Akash Bobba, Greg Hogan, Veronica Hinton, Tim Curry, Alan Brooks, Michael Mahoney, or Katika Floyd.

14.   This request sought records from January 20, 2025, through the date of the search.

15.   On June 30, 2025, OPM acknowledged this request and assigned it tracking number

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[6] Ian Kullgren, *DOGE's AI Plan to Kill 100,000 Rules Has a Bark Bigger Than Bite*, Bloomberg Law (Aug. 12, 2025), https://news.bloomberglaw.com/bloomberg-government-news/doges-ai-plan-to-kill-100-000-rules-has-a-bark-bigger-than-bite.

25-HQ-2031-F.

16.   DFF has not received any further communication from OPM regarding this request.

OPM Schedule F AI Inputs and Outputs Request (25-HQ-2032-F)

17.   On June 30, 2025, DFF sent a FOIA request to OPM seeking the following:

(1) All searches, prompts, instructions, queries, or inputs into any automated systems or generative artificial intelligence tools used to analyze or otherwise review comments submitted in response to OPM's proposed rule on "Improving Performance, Accountability and Responsiveness in the Civil Service," which may also be referred to as "Schedule Policy/Career," "Schedule P/C," or "Schedule F."

(2) All outputs (such as reports, recommendations, summaries, syntheses, or compilations of data) generated from any artificial intelligence system or tool used to analyze or otherwise review comments submitted in response to OPM's proposed rule on "Improving Performance, Accountability and Responsiveness in the Civil Service," which may also be referred to as "Schedule Policy/Career," "Schedule P/C," or "Schedule F."

(3) All instructions provided to staff concerning the use of artificial intelligence to analyze or otherwise review comments submitted in response to OPM's proposed rule on "Improving Performance, Accountability and Responsiveness in the Civil Service," which may also be referred to as "Schedule Policy/Career," "Schedule P/C," or "Schedule F."

18.   This request sought records from January 20, 2025, through the date of the search.

19.   On June 30, 2025, OPM acknowledged this request and assigned it tracking number

25-HQ-2032-F.

20.   DFF has not received any further communication from OPM regarding this request.

GSA Use of AI in Deregulations Request (2025-FOI-01748)

21.   On July 11, 2025, DFF sent a FOIA request to GSA seeking the following:

(1) All electronic communications (including emails, email attachments, memoranda, presentations, complete email chains,

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calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Slack and Microsoft Teams) sent or received by (A) the government employees listed below (B) containing any of the following key terms

    a. Government employees:
- i. Thomas Shedd
- ii. Stephan Ehikian
- iii. Any USDS or DOGE-affiliated employees detailed to or employed by your agency

    b. Key terms:
- i. "AI" AND "regulatory"
- ii. "Artificial intelligence" AND "regulatory"
- iii. "AI" AND "sub-regulatory"
- iv. "Artificial intelligence" AND "sub-regulatory"
- v. "AI" AND "policy"
- vi. "Artificial intelligence" AND "policy"
- vii. "AI" AND "policies"
- viii. "Artificial intelligence" AND "policies"
- ix. "AI" AND "unconstitutional"
- x. "Artificial intelligence" AND "unconstitutional"
- xi. "AI" AND "unlawful"
- xii. "Artificial intelligence" AND "unlawful"
- xiii. "AI" AND "inconsistent"
- xiv. "Artificial intelligence" AND "inconsistent"
- xv. "AI" AND "delete"
- xvi. "Artificial intelligence" AND "delete"
- xvii. "AI" AND "deleting"
- xviii. "Artificial intelligence" AND "deleting"
- xix. "AI" AND "deleted"
- xx. "Artificial intelligence" AND "deleted"
- xxi. "AI" AND "repeal"
- xxii. "Artificial intelligence" AND "repeal"
- xxiii. "AI" AND "rescind"
- xxiv. "Artificial intelligence" AND "rescind'"
- xxv. "AI" AND "statutorily required"
- xxvi. "Artificial intelligence" AND "statutorily required"
- xxvii. "AI" AND "EO 14219"
- xxviii. "Artificial intelligence" AND "EO 14219"
- xxix. "AI" AND "EO14219"
- xxx. "Artificial intelligence" AND "EO14219"

(2) All records reflecting communications (including emails, email attachments, memoranda, presentations, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Slack and Microsoft

Teams) of Thomas Shedd concerning the use of artificial intelligence to repeal or rewrite federal regulations or to analyze regulatory comments.

(3) All records reflecting communications (including emails, email attachments, memoranda, presentations, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Slack and Microsoft Teams) between Thomas Shedd and Christopher Sweet.

(4) A copy of the document "Policy Playbook Review: A guide for agency policy reviews to ensure alignment to Trump Administration priorities" sent from GSA to heads of agencies on February 21, 2025.

(5) All outputs or reports generated by artificial intelligence tools used to repeal or rewrite federal regulations or to analyze regulatory comments, such as a list of spreadsheets identifying regulations an artificial intelligence tool flagged for repeal or deletion.

22.   This request sought records from January 20, 2025, through the date of the search.

23.   On July 11, 2025, assigned it tracking number 2025-FOI-01748.

24.   On September 10, 2025, GSA sent an acknowledgement letter for this request.

25.   DFF has not received any further communication from GSA regarding this request.

HUD AI Communications Request (25-FI-HQ-03675)

26.   On August 15, 2025, DFF sent a FOIA request to HUD seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Slack and Microsoft Teams) sent or received by (A) the agency officials listed below containing (B) any of the following key terms.

A. Federal employees:
   a.   Secretary Scott Turner
   b.   Anyone serving in the role of deputy secretary
   c.   Anyone serving in the role of chief of staff to the Secretary or Deputy Secretary
   d.   Anyone serving in the role of deputy chief of staff to the

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Secretary
    e. Christopher Sweet
    f. Scott Langmack
    g. Irving Dennis
    h. Any Department of Government Efficiency ("DOGE")-affiliated employees based at or detailed to HUD

B. Key terms
    a. "Large language model"
    b. LLM
    c. Grok
    d. xAI
    e. ChatGPT
    f. "Department of Government Efficiency AI Assistant"
    g. SweetREX
    h. "Deregulation AI Plan Builder"
    i. DAIP
    j. "Chris Sweet"
    k. "Christopher Sweet"

27. The request stated that it did not seek records containing the terms "Chris Sweet" or "Christopher Sweet" in the electronic communications of custodian Christopher Sweet.

28. This request sought records from January 20, 2025, through the date of the search.

29. On August 22, 2025, HUD acknowledged this request and assigned it tracking number 25-FI-HQ-03675.

30. On September 22, 2025, HUD sent a letter stating that it would not respond even by its extended deadline.

31. On September 30, 2025, DFF sent HUD a message offering to narrow its request in multiple ways.

32. DFF has not received any further communication from HUD regarding this request.

OMB AI Communications Request (2025-1816)

33. On August 15, 2025, DFF sent a FOIA request to OMB seeking the following:

All electronic communications (including emails, email

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attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages, or messages on messaging platforms, including Slack and Microsoft Teams) sent or received by (A) the agency officials listed below containing (B) any of the following key terms.

A. Federal employees:
   a. Director Russell Vought
   b. Anyone serving as Chief of Staff or Acting Chief of Staff
   c. Anyone serving as the Chief Information Officer or Acting Chief Information Officer
   d. Any Department of Government Efficiency ("DOGE")-affiliated employees based at or detailed to OMB
B. Key terms
   a. "Large language model"
   b. LLM
   c. Grok
   d. xAI
   e. ChatGPT
   f. "Department of Government Efficiency AI Assistant"
   g. SweetREX
   h. "Deregulation AI Plan Builder"
   i. DAIP
   j. "Chris Sweet"
   k. "Christopher Sweet"

34. This request sought records from January 20, 2025, through the date of the search.

35. On August 18, 2025, OMB acknowledged this request and assigned it tracking number 2025-1816.

36. DFF has not received any further communication from OMB regarding this request.

Exhaustion of Administrative Remedies

37. As of the date of the Complaint, Defendants have failed to notify DFF of determinations regarding Democracy Forward's OPM Guidance and Communications, OPM Schedule F AI Inputs and Outputs, GSA Use of AI in Deregulations, HUD AI Communications, and OMB AI Communications requests Through Defendants' failure to respond within the time

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limits required by law, DFF has constructively exhausted administrative remedies.

CLAIM FOR RELIEF

Count 1 (Violation of FOIA, 5 U.S.C. § 552)

38.   Plaintiff incorporates by reference the foregoing paragraphs as though fully set forth herein.

39.   By failing to respond to Plaintiff's requests with determinations and prompt productions of responsive records within the statutorily mandated time period, Defendants have violated their duties under 5 U.S.C.§ 552, including but not limited to, their duties to conduct a reasonable search for responsive records, to take reasonable steps to release all nonexempt information, and to not withhold responsive records.

REQUEST FOR RELIEF

WHEREFORE, Plaintiff requests that this Court:

1.   Order Defendants to conduct searches for any and all responsive records to Plaintiff's FOIA requests using search methods reasonably calculated to lead to discovery of all responsive records;

2.   Order Defendants to produce, by a date certain, any and all non-exempt responsive records and a *Vaughn* index of any responsive records withheld under a claim of exemption;

3.   Enjoin Defendants from continuing to withhold any and all non-exempt responsive records;

4.   Award Plaintiff its costs, attorneys' fees, and other disbursements for this action; and

5.   Grant any other relief this Court deems appropriate.

Dated: October 1, 2025

Respectfully submitted,

/s/ *Daniel A. McGrath*

Daniel A. McGrath
(D.C. Bar No. 1531723)
Robin F. Thurston
(Bar No. 7268942)
Anisha N. Hindocha
(Bar No. 1725159)
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043
(202) 448-9090
dmcgrath@democracyforward.org
rthurston@democracyforward.org
ahindocha@democracyforward.org

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS Democracy Forward Foundation	DEFENDANTS U.S. Office of Personnel Management, General Services Administration, U.S. Department of Housing and Urban Development, Office of Management and Budget
(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF _____ **(EXCEPT IN U.S. PLAINTIFF CASES)**	COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ **(IN U.S. PLAINTIFF CASES ONLY)** NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED
(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER) Daniel McGrath, Anisha Hindocha, Robin Thurston Democracy Forward Foundation P.O. Bx 34553, Washington, D.C. 20043 202-448-9090	ATTORNEYS (IF KNOWN)

II. BASIS OF JURISDICTION
(PLACE AN x IN ONE BOX ONLY)

- ○ 1 U.S. Government Plaintiff
- ● 2 U.S. Government Defendant
- ○ 3 Federal Question (U.S. Government Not a Party)
- ○ 4 Diversity (Indicate Citizenship of Parties in item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!

	PTF	DFT		PTF	DFT
Citizen of this State	○ 1	○ 1	Incorporated or Principal Place of Business in This State	○ 4	○ 4
Citizen of Another State	○ 2	○ 2	Incorporated and Principal Place of Business in Another State	○ 5	○ 5
Citizen or Subject of a Foreign Country	○ 3	○ 3	Foreign Nation	○ 6	○ 6

IV. CASE ASSIGNMENT AND NATURE OF SUIT
(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

○ **A.** *Antitrust*

- ☐ 410 Antitrust

○ **B.** *Personal Injury/ Malpractice*

- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Medical Malpractice
- ☐ 365 Product Liability
- ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Product Liability

○ **C.** *Administrative Agency Review*

- ☐ 151 Medicare Act

Social Security
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

Other Statutes
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 890 Other Statutory Actions (If Administrative Agency is Involved)

○ **D.** *Temporary Restraining Order/Preliminary Injunction*

Any nature of suit from any category may be selected for this category of case assignment.

(If Antitrust, then A governs)

○ **E.** *General Civil (Other)*   OR   ○ **F.** *Pro Se General Civil*

Real Property
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent, Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

Personal Property
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

Bankruptcy
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

Prisoner Petitions
- ☐ 535 Death Penalty
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Conditions
- ☐ 560 Civil Detainee – Conditions of Confinement

Property Rights
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent – Abbreviated New Drug Application
- ☐ 840 Trademark
- ☐ 880 Defend Trade Secrets Act of 2016 (DTSA)

Federal Tax Suits
- ☐ 870 Taxes (US plaintiff or defendant)
- ☐ 871 IRS-Third Party 26 USC 7609

Forfeiture/Penalty
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

Other Statutes
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 430 Banks & Banking
- ☐ 450 Commerce/ICC Rates/etc
- ☐ 460 Deportation
- ☐ 462 Naturalization Application

- ☐ 465 Other Immigration Actions
- ☐ 470 Racketeer Influenced & Corrupt Organization
- ☐ 480 Consumer Credit
- ☐ 485 Telephone Consumer Protection Act (TCPA)
- ☐ 490 Cable/Satellite TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes
- ☐ 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

○ G. *Habeas Corpus/ 2255*	○ H. *Employment Discrimination*	◉ I. *FOIA/Privacy Act*	○ J. *Student Loan*
☐ 530 Habeas Corpus – General ☐ 510 Motion/Vacate Sentence ☐ 463 Habeas Corpus – Alien Detainee	☐ 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	☒ 895 Freedom of Information Act ☐ 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	☐ 152 Recovery of Defaulted Student Loan (excluding veterans)
○ K. *Labor/ERISA (non-employment)*	○ L. *Other Civil Rights (non-employment)*	○ M. *Contract*	○ N. *Three-Judge Court*
☐ 710 Fair Labor Standards Act ☐ 720 Labor/Mgmt. Relations ☐ 740 Labor Railway Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Empl. Ret. Inc. Security Act	☐ 441 Voting (if not Voting Rights Act) ☐ 443 Housing/Accommodations ☐ 440 Other Civil Rights ☐ 445 Americans w/Disabilities – Employment ☐ 446 Americans w/Disabilities – Other ☐ 448 Education	☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholder's Suits ☐ 190 Other Contracts ☐ 195 Contract Product Liability ☐ 196 Franchise	☐ 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN

◉ 1 Original Proceeding ○ 2 Removed from State Court ○ 3 Remanded from Appellate Court ○ 4 Reinstated or Reopened ○ 5 Transferred from another district (specify) ○ 6 Multi-district Litigation ○ 7 Appeal to District Judge from Mag. Judge ○ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
5 U.S.C. § 552 an action to compel compliance with the Freedom of Information Act

VII. REQUESTED IN COMPLAINT ☐ CHECK IF THIS IS A **CLASS ACTION** UNDER F.R.C.P. 23 DEMAND $ ___ JURY DEMAND: Check YES only if demanded in complaint YES ☐ NO ☒

VIII. RELATED CASE(S) IF ANY (See instruction) YES ☐ NO ☒ If yes, please complete related case form

DATE: 10/1/2025 SIGNATURE OF ATTORNEY OF RECORD /s/ Daniel A. McGrath

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

I.   COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.

III.   CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.

IV.   CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.

VI.   CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.

VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation   )
_____   )
Plaintiff   )
)
v.   )   Civil Action No. 25-cv-
)
U.S. Office of Personnel Management, et al.   )
_____   )
Defendant   )

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
                        Civil Process Clerk
                        U.S. Attorney's Office for the District of Columbia,
                        601 D Street NW, Washington, D.C. 20530

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

                        Daniel A. McGrath
                        Democracy Forward Foundation
                        P.O. Box 34553
                        Washington, D.C. 20043

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

                                        ANGELA D. CAESAR, CLERK OF COURT

Date: _____   _____
                                                Signature of Clerk or Deputy Clerk

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❏ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❏ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❏ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❏ I returned the summons unexecuted because _____ ; or

❏ Other *(specify):*

_____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation	)
Plaintiff	)
	)
v.	)
U.S. Office of Personnel Management, et al.	)
Defendant	)

Civil Action No. 25-cv-

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

U.S. OFFICE OF PERSONNEL MANAGEMENT,
1900 E Street NW,
Washington, D.C. 20415

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Daniel A. McGrath
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____   _____
                              Signature of Clerk or Deputy Clerk

FOIA Summons (1/13) (Page 2)

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❏ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❏ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❏ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❏ I returned the summons unexecuted because _____ ; or

❏ Other *(specify):*

_____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ ___0.00___ .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation)
————————————————————)
Plaintiff)
)
v.)   Civil Action No. 25-cv-
)
U.S. Office of Personnel Management, et al.)
————————————————————)
Defendant)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

OFFICE OF MANAGEMENT AND BUDGET,
725 17th St NW,
Washington, D.C. 20503

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Daniel A. McGrath
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____   _____
                                        Signature of Clerk or Deputy Clerk

FOIA Summons (1/13) (Page 2)

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

_____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation	)
Plaintiff	)
	)
v.	)
U.S. Office of Personnel Management, et al.	)
Defendant	)
	)
	)

Civil Action No. 25-cv-

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT,
451 7th St SW,
Washington, D.C. 20410

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Daniel A. McGrath
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

     This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

    ❒ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

    ❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

    ❒ I served the summons on *(name of individual)* _____ , who is

  designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

    ❒ I returned the summons unexecuted because _____ ; or

    ❒ Other *(specify):*

_____ .

    My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00   .

    I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation)
)
_____   )
         Plaintiff   )
)
         v.   )   Civil Action No. 25-cv-
)
U.S. Office of Personnel Management, et al.   )
)
_____   )
         Defendant   )

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
                           GENERAL SERVICES ADMINISTRATION,
                           1800 F Street NW,
                           Washington, D.C. 20405

         A lawsuit has been filed against you.

         Within 30 days after service of this summons on you (not counting the day you received it) you must
serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of
Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and
address are:
                           Daniel A. McGrath
                           Democracy Forward Foundation
                           P.O. Box 34553
                           Washington, D.C. 20043

         If you fail to respond, judgment by default may be entered against you for the relief demanded in the
complaint. You also must file your answer or motion with the court.

                                                          ANGELA D. CAESAR, CLERK OF COURT

Date: _____   _____
                                                  Signature of Clerk or Deputy Clerk

FOIA Summons (1/13) (Page 2)

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❑ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❑ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❑ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❑ I returned the summons unexecuted because _____ ; or

❑ Other *(specify):*

_____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Democracy Forward Foundation

)
)

Plaintiff

)
)
)

v.

)

Civil Action No. 25-cv-

U.S. Office of Personnel Management, et al.

)
)
)

Defendant

)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* c/o Civil Process Clerk
Pam Bondi, in her official capacity as U.S. Attorney General
950 Pennsylvania Ave NW,
Washington, D.C. 20530

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Daniel A. McGrath
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

_____
Signature of Clerk or Deputy Clerk

FOIA Summons (1/13) (Page 2)

Civil Action No. 25-cv-xxx

PROOF OF SERVICE
(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____

was received by me on *(date)* _____ .

❒ I personally served the summons on the individual at *(place)* _____

_____ on *(date)* _____ ; or

❒ I left the summons at the individual's residence or usual place of abode with *(name)* _____

_____ , a person of suitable age and discretion who resides there,

on *(date)* _____ , and mailed a copy to the individual's last known address; or

❒ I served the summons on *(name of individual)* _____ , who is

designated by law to accept service of process on behalf of *(name of organization)* _____

_____ on *(date)* _____ ; or

❒ I returned the summons unexecuted because _____ ; or

❒ Other *(specify):*

_____ .

My fees are $ _____ for travel and $ _____ for services, for a total of $ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

_____
Server's signature

_____
Printed name and title

_____
Server's address

Additional information regarding attempted service, etc: