

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

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

Plaintiff,

vs.

Case No. 25-cv-

FEDERAL HOUSING FINANCE AGENCY,
Constitution Center
400 7th Street SW
Washington, D.C. 20219,

Defendant.

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation (“DFF”) brings this action against Defendant Federal Housing Finance Agency (“FHFA”) 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 Federal Housing Finance Agency (“FHFA”) is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. FHFA’s Office of Inspector General (“OIG”) is a component of FHFA. FHFA has possession, custody, and control of records to which Plaintiff seeks access.

Facts

5. In recent months, the Trump-Vance Administration, with the support of FHFA Director William J. Pulte, has engaged in an unprecedented politicization of the administration of justice. The President has repeatedly directly called for the prosecution of perceived opponents and obstacles to expansions of his power. Director Pulte has reportedly used his role as leader of the nation’s housing finance regulatory agency to further these aims, making criminal referrals to the Department of Justice (“DOJ”) concerning allegations against the President’s perceived opponents shortly after assuming his position. DFF filed several FOIA requests with FHFA to shed further light on these matters of intense public concern.

6. Between April and August 2025, FHFA Director Pulte sent criminal referral letters to the Department of Justice for public officials over possible mortgage fraud.

7. On April 14, 2025, Director Pulte referred allegations of purported wrongdoing against New York State Attorney General Letitia James to DOJ Attorney General Pamela J. Bondi.¹ The Director of the Federal Bureau of Investigations, Kash Patel, confirmed the FBI had initiated an investigation on the allegations against Letitia James.² On May 27, 2025, Director

¹ Jesse Zanger & Alice Gainer, *New York Attorney General Letitia James accused of possible mortgage fraud*, CBS News (Apr. 18, 2025), <https://perma.cc/T8CK-C87H>.

² Kara Scannell & Hannah Rabinowitz, *FBI director confirms federal probe into New York attorney general*, CNN (May 19, 2025), <https://perma.cc/2D7P-26M8>.

Pulte referred Senator Adam B. Schiff to Attorney General Bondi.³ And on August 15, 2025, Director Pulte referred Federal Reserve Governor Lisa Cook to Attorney General Bondi and U.S. Pardon Attorney Ed Martin Jr.⁴

8. Copies of each criminal referral letter and the mortgage documents for each referred individual were made available online. Numerous media outlets published James' letter and mortgage documents.⁵ President Trump posted a portion of Schiff's mortgage document on Truth Social.⁶ FHFA Director Pulte posted Cook's criminal referral letter and a picture of her signatures on a mortgage document on X.com, and confirmed exchange of these documents with Pardon Attorney Martin on the same platform.⁷ Director Pulte subsequently deleted this X message, but a screenshot of it is included below:

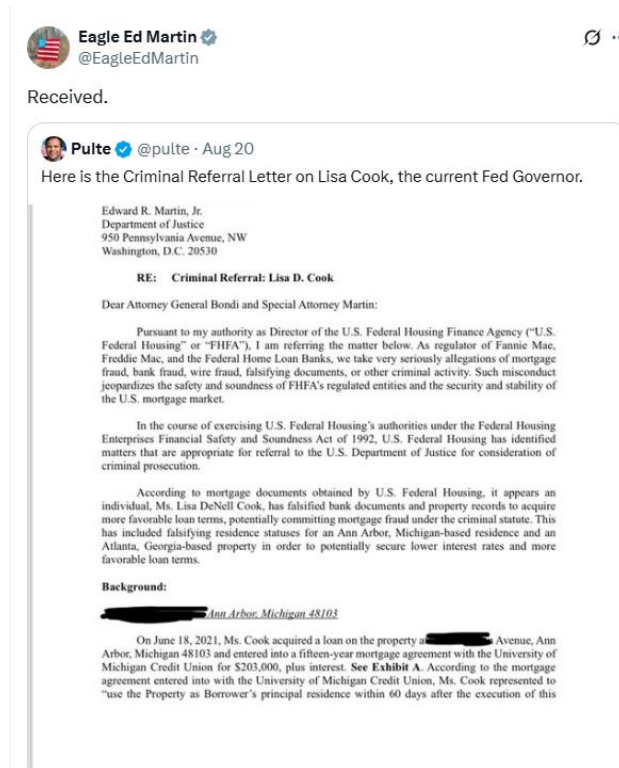
³ Kevin Rector & Laura J. Nelson, *Trump accuses Schiff of mortgage fraud, which Schiff calls false 'political retaliation'*, The Los Angeles Times (July 15, 2025), <https://perma.cc/XLX3-HPNU>; see also Letter from William J. Pulte, Dir. U.S. Fed. Hous. Fin. Agency, to Pamela J. Bondi, Att'y Gen. & Todd Blanche, Deputy U.S. Att'y Gen. (May 27, 2025), <https://perma.cc/S78U-NGZ6>.

⁴ Jeremy Herb, *How an obscure housing director launched Trump's firing of Fed governor Lisa Cook*, CNN (Aug. 26, 2025), <https://perma.cc/4F26-YGFD>.

⁵ Caitlin Doornbos, Carl Campanile, & Chris Nesi, *FBI opens formal criminal probe into New York AG Letitia James over alleged mortgage fraud*, New York Post (May 8, 2025), <https://perma.cc/X5FV-9BWQ/>.

⁶ Donald J. Trump (@realDonaldTrump), Truth Social (July 20, 2025, 2:03 PM), <https://perma.cc/NZG2-5YFY>.

⁷ William J. Pulte (@pulte), X (Aug. 20, 2025), <https://perma.cc/7AVL-LF73>; Edward R. Martin Jr. (@EagleEdMartin), X (Aug. 20, 2025, 11:21 PM), <https://perma.cc/EP8S-A7EA>.



9. President Trump has used these criminal referral letters as the basis for calling for the prosecution or firing of these public officials.⁸

Schiff-James Referral Request (2025-FOIA-098)

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

1. All communications (including email messages, complete email chains, calendar invitations, or attachments thereto) between (a) any of the FHFA officials listed below and (b) any of the Department of Justice officials identified below, regarding the Criminal Referral of Senator Adam B. Schiff for alleged mortgage fraud sent from William J. Pulte to Pamela J. Bondi on May 27, 2025.⁹[FN in original].

⁸ Madeline Halpert, *Trump administration seeks criminal prosecution of New York attorney general*, BBC News (Apr. 16, 2025), <https://perma.cc/32FC-YXFE>; Alia Shoaib, *Donald Trump Calls for Senator To Be Jailed: 'Big Trouble'*, Newsweek (July 21, 2025), <https://perma.cc/A3L4-P23F>; Mary Cunningham, *Trump calls on Federal Reserve Governor Lisa Cook to resign after she was accused of mortgage fraud*, CBS News (Aug. 22, 2025), <https://perma.cc/TVG4-AD7G>.

⁹ William J. Pulte, *RE: CRIMINAL REFERRAL*, Federal Housing Finance Agency (May 27, 2025), https://static.foxnews.com/foxnews.com/content/uploads/2025/07/referral_letter_may_27__002_.pdf [<https://perma.cc/S78U-NGZ6>].

A. Federal Housing Finance Agency Officials

- a. William J. Pulte
- b. Sean Sowards, Fraud Director at Fannie Mae
- c. Priscilla Almodovar, President and Chief Executive Officer at Fannie Mae
- d. Anthony Moon, Executive Vice President and Chief Risk Officer at Fannie Mae

B. Department of Justice Officials

- a. Pamela J. Bondi, Attorney General
- b. Todd Blanche, Deputy Attorney General
- c. Matthew R. Galeotti, Acting Assistant Attorney General of the Criminal Division
- d. Lorinda Laryea, Acting Chief of Fraud Section
- e. Sean Tonolli, Senior Deputy Chief of Fraud Section

2. All communications (including email messages, complete email chains, calendar invitations, or attachments thereto) **sent** from William J. Pulte containing any of the following key terms:
- a. “Schiff”
 - b. “Powell”
 - c. “Letitia James”
 - d. “PulteGroup”
 - e. “ML Organization”
 - f. “Pulte Capital Partners”
 - g. “Pulte Mortgage”

11. This request sought records from March 1, 2025, through the date of the search.

12. On July 22, 2025, FHFA acknowledged this request and assigned it tracking number 2025-FOIA-098.

13. On August 28, 2025, FHFA sent a message stating that a document search had been requested for 2025-FOIA-098.

14. DFF has not received any further communication from FHFA regarding this request.

Cook Referral Request (2025-FOIA-138)

15. On August 29, 2025, DFF sent a FOIA request to FHFA seeking the following on an expedited basis:

- (1) All communications (including email messages, complete email chains, calendar invitations, or attachments thereto) between (a) any of the FHFA officials listed below and (b) any of the Department of Justice officials identified below, regarding the Criminal Referral of Federal Reserve Governor Lisa Cook for alleged mortgage fraud sent from William J. Pulte to Pamela J. Bondi and Edward R. Martin Jr. on August 15, 2025.¹⁰ [FN in original]

- A. Federal Housing Finance Agency Officials

- a. William J. Pulte, Director of FHFA
- b. John Allen, Chief Counsel for FHFA Office of Inspector General
- c. Christina Norton, Vice President of Operations, Public Relations, and External Affairs at FHFA
- d. Anyone serving as Chief of Staff
- e. Anyone serving as Senior Advisor or Counselor to the Director of FHFA

- B. Department of Justice Officials

- a. Pamela J. Bondi, Attorney General
- b. Edward R. Martin Jr., Pardon Attorney,^{11 12} [FNs in original]
- c. Todd Blanche, Deputy Attorney General
- d. Matthew R. Galeotti, Acting Assistant Attorney General of the Criminal Division
- e. Lorinda Laryea, Acting Chief of Fraud Section
- f. Sean Tonolli, Senior Deputy Chief of Fraud Section
- g. Kash Patel, Director of the Federal Bureau of Investigation

- (2) All email communications (including email messages, complete email chains, calendar invitations, or attachments thereto) sent from William J. Pulte containing any of the following key terms:

- a. “Lisa Cook”
- b. “DeNell”
- c. “Federal Reserve”
- d. “The Fed”

¹⁰ William J. Pulte (@pulte), X (Aug. 20, 2025), <https://perma.cc/7AVL-LF73>.

¹¹ Letter from Edward R. Martin, Jr., U.S. Pardon Att’y, DOJ, to Hon. Jerome Powell, Chairman, Fed. Rsrv. Bd. (Aug. 21, 2025), <https://perma.cc/9RPX-PKF7>.

¹² Edward R. Martin Jr. (@EagleEdMartin), X (Aug. 20, 2025, 11:21 PM), <https://perma.cc/EP8S-A7EA>.

- e. “University of Michigan Credit Union”
- f. “Bank Fund Staff Federal Credit Union”

- (3) All records reflecting any request from the FHFA Office of the Director, including Director William J. Pulte or his immediate subordinates, to Fannie Mae or Freddie Mac for access to or copies of the mortgage or other financial information of specific individuals.
- (4) All records reflecting communications (including email messages, complete email chains, calendar invitations, or attachments thereto, as well as any text messages or messages sent on messaging platforms such as Microsoft Teams, Skype, WhatsApp, Signal, or GChat) between FHFA Director William J. Pulte and James T. Fishback.

16. This request sought records from March 1, 2025, through the date of the search.

17. On September 8, 2025, FHFA acknowledged this request and assigned it tracking number 2025-FOIA-138.

18. DFF has not received any further communication from FHFA regarding this request.

Pulte Referrals and WH Comms Request (2025-FOIA-139)

19. On August 29, 2025, DFF sent a FOIA request to FHFA seeking the following on an expedited basis:

- 1. All criminal referral letters sent from FHFA Director William J. Pulte or any other FHFA official (other than officials within the FHFA Office of Inspector General) to the Department of Justice regarding alleged mortgage fraud by particular individuals, including but not limited to the referrals publicly mentioned on Pulte’s post on X.com on August 22, 2025.¹³ [FN in original]
- 2. All records reflecting communications (including email communications, text message and similar message communications, calendar entries, and documents summarizing or reflecting the content of phone calls or meetings) of William J. Pulte with any staff of the White House, including with President Trump.

¹³ William J. Pulte (@pulte), X (Aug. 22, 2025, 8:51PM), <https://perma.cc/9LQT-9B49>.

20. This request sought records from March 1, 2025, through the date of the search.

21. On September 8, 2025, FHFA acknowledged this request and assigned it tracking number 2025-FOIA-139.

22. DFF has not received any further communication from FHFA regarding this request.

FHFA OIG Document Demands (2025-FOIA-00050)

23. On September 12, 2025, DFF sent a FOIA request to FHFA's Office of Inspector General ("OIG") seeking the following on an expedited basis:

- (1) Copies of all "document demands" sent from the FHFA - OIG to Fannie Mae and Freddie Mac requesting the mortgage records of Letitia James, Adam Schiff, and Lisa Cook.
- (2) All internal documents reflecting the procedures, guidelines, and role of the FHFA - OIG in investigating and referring potential criminal cases.
- (3) All communications (including email messages, complete email chains, calendar invitations, or attachments thereto) between FHFA Director William J. Pulte and Joe Allen, Chief Counsel for FHFA OIG, containing any of the following key terms:
 - a. "Letitia James"
 - b. "Adam Schiff"
 - c. "Lisa Cook"
 - d. "document demand"
 - e. "Criminal referral"

Records regarding the criminal referrals of Letitia James, Adam Schiff, and Lisa Cook have been published online by news sources and public figures, including Director Pulte himself, on social media such that application of FOIA exemptions should be limited given official acknowledgement of these matters.¹⁴

24. This request sought records from March 1, 2025, through the date of the search.

25. On September 12, 2025, FHFA OIG acknowledged this request and assigned it

¹⁴ William J. Pulte (@pulte), X (Aug. 20, 2025), <https://perma.cc/7AVL-LF73>.

tracking number 2025-FOIA-00050. On September 15, 2025, FHFA OIG sent an acknowledgment letter for the request.

26. On September 23, 2025, FHFA OIG sent a letter approving DFF's request for expedited processing based on the "urgency to inform the public about an actual or alleged Federal Government activity." FHFA OIG also stated it was treating September 15, 2025, as the date of receipt, but DFF maintains it submitted the FOIA on September 12, 2025, within business hours.

27. DFF has not received any further communication from FHFA OIG regarding this request.

Exhaustion of Administrative Remedies

28. As of the date of the Complaint, Defendant has failed to notify DFF of determinations regarding DFF's requests. Through Defendant's failure to respond within the time limits required by law, DFF has constructively exhausted administrative remedies.

CLAIM FOR RELIEF

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

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

30. By failing to respond to Plaintiff's requests with determinations and prompt productions of responsive records within the statutorily mandated time period, Defendant has violated its duties under 5 U.S.C. § 552, including but not limited to, its 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 Defendant 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 Defendant 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 Defendant 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 20, 2025

Respectfully submitted,

/s/ Anisha Hindocha

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