

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. DEPARTMENT OF JUSTICE
950 Pennsylvania Avenue, NW
Washington, DC 20530

FEDERAL BUREAU OF INVESTIGATION
935 Pennsylvania Avenue, NW
Washington, DC 20535

Defendants.

Case No. 25-cv-4297

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation (“DFF”) brings this action against Defendants U.S. Department of Justice (“DOJ”) and the Federal Bureau of Investigation (“FBI”) 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 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 DOJ is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. DOJ has possession, custody, and control of records to which Plaintiff seeks access.

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

Facts

The Trump Administration’s Handling of the “Epstein Files”

6. On July 6, 2019, hedge-fund manager Jeffrey Epstein was arrested on federal charges related to sex trafficking.¹

7. The unsealed indictment alleged that between 2002 and 2005, Epstein recruited dozens of underage girls to his residences in New York City and Palm Beach, Florida for sexual acts in exchange for money, and often paid them to recruit additional minors to engage in similar sex acts for money.²

¹ See Margaret Talbot, *The Judicial System Finally Catches up to Jeffrey Epstein*, The New Yorker (Jul. 10, 2019), <https://www.newyorker.com/news/daily-comment/the-judicial-system-finally-catches-up-to-jeffrey-epstein>.

² See Press Release, U.S. Attorney’s Off. for the S. Dist. of N.Y., *Jeffrey Epstein Charged in Manhattan Federal Court with Sex Trafficking of Minors*, U.S. Dep’t of Just. (Jul. 8, 2019), <https://www.justice.gov/usao-sdny/pr/jeffrey-epstein-charged-manhattan-federal-court-sex-trafficking-minors>.

8. Epstein pled not guilty but died by suicide in jail on August 10, 2019.³

9. On August 29, 2019, the indictment against Epstein was dismissed in light of his death.⁴

10. On December 29, 2021, Epstein's ex-girlfriend, Ghislaine Maxwell, was convicted of conspiring with Epstein to traffic girls for sex⁵ and is currently serving a 20-year sentence in federal prison.⁶

11. In January 2024, unsealed court documents disclosed the names of dozens of powerful men with alleged connections to Epstein, including President Donald J. Trump, British Royal Prince Andrew, former President Bill Clinton, lawyer Alan Dershowitz, and others.⁷

12. This and other information raise persistent questions about what the government uncovered during the years of investigation into Epstein's criminal activity. Accordingly, there has

³ See Sarah N. Lynch, *Disgraced money manager Jeffrey Epstein dead in apparent suicide*, Reuters (Aug. 10, 2019), <https://www.reuters.com/article/world/disgraced-money-manager-jeffrey-epstein-dead-in-apparent-suicide-idUSKCN1V00GZ/>; see also Press Release, DOJ Off. of the Inspector Gen., *DOJ OIG Releases Report on the BOP's Custody, Care, and Supervision of Jeffrey Epstein at the Metropolitan Correctional Center in New York, New York* (June 27, 2023), <https://oig.justice.gov/news/doj-oig-releases-report-bops-custody-care-and-supervision-jeffrey-epstein-metropolitan>.

⁴ See U.S. Atty's Off. for the S. Dist. of N.Y., *United States v. Jeffrey Epstein, 19 Cr. 490 (RMB) – Victim-Witness Services*, U.S. Dep't of Just., <https://www.justice.gov/usao-sdny/programs/victim-witness-services/united-states-v-jeffrey-epstein-19-cr-490-rmb> (last visited Aug. 1, 2025).

⁵ Luc Cohen et al., *Ghislaine Maxwell Convicted of Recruiting Teenage Girls for Epstein Sex Abuse*, Reuters (Dec. 30, 2021), <https://www.reuters.com/world/us/maxwell-jury-resume-deliberations-after-judge-warns-omicron-risk-2021-12-29/>.

⁶ Luc Cohen et al., *Ghislaine Maxwell sentenced to 20 years for 'horrific' sex trafficking*, Reuters (June 28, 2022), <https://www.reuters.com/legal/government/ghislaine-maxwell-be-sentenced-sex-trafficking-conviction-2022-06-28/>.

⁷ Brian Mann, *Court documents reveal names of powerful men allegedly linked to Jeffrey Epstein*, NPR (Jan. 4, 2024), <https://thepublicsradio.org/npr/court-documents-reveal-names-of-powerful-men-allegedly-linked-to-jeffrey-epstein-77>.

been broad-based public pressure for the government to release that information by disclosing records that are often referred to as the “Epstein files.”⁸

13. There is widespread public speculation that the Epstein files contain a roster of powerful clients to whom Epstein trafficked underaged girls. This list has become known as the “Epstein list” or the “client list.”⁹

14. Giving credence to this theory, in 2024, then Presidential candidate Trump said in an interview that as President, he would “probably” release the “Epstein list”:

[Interviewer]: It’s just very strange for a lot of people, that the list of clients that went to [Epstein’s private] island has not been made public.

[Then Presidential candidate Trump]: It’s very interesting, isn’t it? It probably will be, by the way, probably.¹⁰

15. Following President Trump’s reelection and Inauguration, when asked in a televised interview on February 21, 2025, whether DOJ would “really” “be releasing the list of

⁸ See e.g., Nik Popli, *These House Republicans Want All of the Epstein Files Released*, TIME (Jul. 21, 2025), <https://time.com/7304138/epstein-files-house-republicans/>; Chantelle Lee, *Democratic Congressman Introduces Resolution Demanding Trump Release Epstein Files: ‘I’m Very Concerned About the Way They Handled This Case,’* TIME (Jul. 14, 2025), <https://time.com/7302296/jeffrey-epstein-files-trump-marc-veasey>; Kenneal Patterson, *Trump Savages MAGA ‘Lunatics’ Demanding More Epstein Files*, The Daily Beast (Jul. 19, 2025), <https://www.thedailybeast.com/trump-savages-lunatics-demanding-epstein-files-release/>; Jordana Comiter, *What Are the Epstein Files? Everything to Know About the Classified Documents Related to Jeffrey Epstein’s Criminal History*, PEOPLE (Jul. 30, 2025), <https://people.com/what-are-the-epstein-files-11781622>.

⁹ See Devlin Barrett et al., *What to Know About the Epstein Files, a Perfect Recipe for Conspiracy Theories*, N.Y. TIMES (Jul. 28, 2025), <https://www.nytimes.com/article/jeffrey-epstein-files-trump.html>.

¹⁰ Lex Fridman, *Transcript for Donald Trump Interview*, at 44:59-45:13 (Sept. 3, 2024), https://lexfridman.com/donald-trump-transcript#chapter16_jeffrey_epstein.

Jeffrey Epstein’s clients,” Attorney General Pam Bondi replied: “It’s sitting on my desk right now to review. That’s been a directive by President Trump.”¹¹

16. Days after Attorney General Bondi publicly stated the Epstein client list was “sitting on [her] desk” for review, DOJ released “[t]he first phase of declassified [Epstein] files,” which contained no “client list,” but rather—by DOJ’s own characterization—comprised mostly materials that were already publicly available.¹²

17. Media outlets report that what ensued over the next few months was a “frantic scouring” of the Epstein files by the FBI and DOJ, for among other things, any references to President Trump.¹³

18. A team of FBI employees was reportedly tasked with redacting references to President Trump in the files and found “numerous references.”¹⁴

19. Media outlets further report that this review was largely completed by mid-April and that shortly thereafter, Attorney General Bondi briefed President Trump that his name appeared in the Epstein files.¹⁵

¹¹ Haley Chi-Sing, *Bondi says Epstein client list ‘sitting on my desk right now,’ and is reviewing JFK, MLK files*, FOX News (Feb. 21, 2025), <https://www.foxnews.com/politics/bondi-says-epstein-client-list-sitting-my-desk-right-now-reviewing-jfk-mlk-files>.

¹² Press Release, U.S. Dep’t of Just., *Attorney General Pamela Bondi Releases First Phase of Declassified Epstein Files* (Feb. 27, 2025), <https://www.justice.gov/opa/pr/attorney-general-pamela-bondi-releases-first-phase-declassified-epstein-files> (stating “[t]he first phase of declassified files largely contains documents that have been previously leaked but never released in a formal capacity by the U.S. Government”).

¹³ Adam Goldman et al., *How a Frantic Scouring of the Epstein Files Consumed the Justice Dept.*, N.Y. Times (Jul. 24, 2025), <https://www.nytimes.com/2025/07/24/us/politics/epstein-files-trump-bondi-justice-department-fbi.html>.

¹⁴ See Jason Leopold, *FBI Redacted Trump’s Name in Epstein Files for Privacy Reasons*, Bloomberg (Aug. 1, 2025), <https://www.bloomberg.com/news/articles/2025-08-01/fbi-redacted-president-donald-trump-s-name-in-the-epstein-files>.

¹⁵ See, e.g., Sadie Gurman et al., *Justice Department Told Trump in May That His Name Is Among Many in the Epstein Files*, Wall Street Journal (Jul. 23, 2025), <https://www.wsj.com/politics/justice-department-told-trump-name-in-epstein-files->

20. On July 7, 2025, the DOJ and FBI issued a memo concluding review of the Epstein files for additional disclosures. The memo stated that after “systematic review” of the Epstein files there was “no incriminating ‘client list’” or “evidence that could predicate an investigation against uncharged third parties.” The memo stated that “no further disclosure” of information regarding Epstein “would be appropriate or warranted.”¹⁶

21. On July 17, 2025, *The Wall Street Journal* reported that President Trump had sent Epstein a “bawdy” letter in 2003 for his 50th birthday that included a sketch of a naked woman and an opaque reference to secrets they shared.¹⁷

22. *The Wall Street Journal* article contained a quote that Mr. Trump gave to *New York Magazine* for a 2002 profile of Epstein:

I’ve known Jeff for fifteen years. Terrific guy. He’s a lot of fun to be with. It is even said that he likes beautiful women as much as I do, and many of them are on the younger side.¹⁸

23. On July 23, *The Wall Street Journal* further reported—for the first time—that Attorney General Bondi had informed President Trump in May that his name was in the Epstein files.¹⁹

24. On July 24 and 25, 2025, despite DOJ and the FBI publicly concluding review of the Epstein files via the July 7 memo, Deputy Attorney General Todd Blanche met with Epstein’s

727a8038?mod=author_content_page_1_pos_1; Maggie Haberman et al., *Attorney General Told Trump His Name Appeared in Epstein Files*, N.Y. Times (Jul. 23, 2025), <https://www.nytimes.com/2025/07/23/us/politics/trump-epstein-files-named.html>.

¹⁶ FBI Memo, July 2025, U.S. Dep’t of Just.

<https://www.justice.gov/opa/media/1407001/dl?inline> (last visited Aug. 1, 2025).

¹⁷ Khadeeja Safdar et al., *Jeffrey Epstein’s Friends Sent Him Bawdy Letters for a 50th Birthday Album. One Was From Donald Trump*, Wall St. J. (Jul. 17, 2025), <https://www.wsj.com/politics/trump-jeffrey-epstein-birthday-letter-we-have-certain-things-in-common>.

¹⁸ *Id.*

¹⁹ Gurman, *supra* note 15.

currently incarcerated co-conspirator Ghislaine Maxwell at the U.S. Attorney's Office in Tallahassee, Florida.²⁰

25. Media outlets report that DOJ granted Maxwell limited immunity to talk “freely” with Deputy Attorney General Blanche during the two days of interviews.²¹

26. On August 1, 2025, the Trump Administration transferred Maxwell to a lower security prison in Texas.²²

27. President Trump has repeatedly refused to rule out granting clemency to Maxwell.²³

28. The above sequence of events resulted in months of bipartisan criticism of the Trump Administration's apparent reversal of its transparency position and pressure by Congress to release the Epstein files.²⁴

29. Finally relenting to Congress's and the public's persistent demands, on November 19, 2025, President Trump signed the Epstein Files Transparency Act, which requires the DOJ to

²⁰ Andrew Skerritt et al., *Epstein associate Ghislaine Maxwell to meet with deputy attorney general again today*, Wash. Post (Jul. 25, 2025), <https://www.washingtonpost.com/national-security/2025/07/24/justice-todd-blanche-epstein-ghislaine-maxwell-trump/>.

²¹ See, e.g., Aaron Katersky et al., *Ghislaine Maxwell Received Limited Immunity During Meetings with Deputy Attorney General: Sources*, ABC News (Jul. 25, 2025), <https://abcnews.go.com/US/deputy-ag-blanche-set-meet-2nd-day-ghislaine/story?id=124064062>.

²² Solcyré Burga, *Sex Trafficker Ghislaine Maxwell Moved to Minimum Security Prison a Week After Meeting With Trump DOJ*, TIME (Aug. 1, 2025), <https://time.com/7306977/ghislaine-maxwell-epstein-prison-texas>.

²³ See, e.g., Brian Bennett, *Trump: Ghislaine Maxwell Pardon 'Inappropriate' to Talk About 'Right Now'*, TIME (Jul. 28, 2025), <https://time.com/7305903/donald-trump-ghislaine-maxwell-pardon>; Sarah Ewall-Wice, *Ghislaine Handed DOJ 100 Names in Shameless Pardon Quid Pro Quo*, Daily Beast (Jul. 26, 2025), <https://www.thedailybeast.com/ghislaine-handed-doj-100-names-in-brazen-pardon-quid-pro-quo>.

²⁴ See, e.g., Laura Loomer (@LauraLoomer), X (Feb. 27, 2025, 1:54 pm), <https://x.com/LauraLoomer/status/1895185785714077995> (“[T]he American people can't trust the validity of the Epstein files released today.”); Rep. Anna Paulina Luna (R-Florida) (@RepLuna), X (Feb. 27, 2025, 2:06 pm), <https://x.com/RepLuna/status/1895188683688681725> (“GET US THE INFORMATION WE ASKED FOR!”); Anna Commander, *Republican Targeted by Trump Says Epstein Issue 'Not Going to Go Away'*, Newsweek (July 23, 2025), <https://www.newsweek.com/republican-targeted-trump-says-epstein-issue-not-going-away-2103191>.

release, with certain exceptions, all information from federal investigations into Epstein by December 19, 2025.²⁵

DFF's FOIA Requests

30. To shed light on the Trump Administration's handling of the Epstein matter, DFF submitted several FOIA requests to the DOJ and FBI seeking senior Administration officials' communications regarding the Epstein matter, including those regarding correspondence between President Trump and Epstein, as well as records concerning agency review of the Epstein matter.

DOJ Attorney General's Review Request

31. On July 25, 2025, DFF sent a request to DOJ for the following:

1. All materials prepared or compiled by DOJ officials for Attorney General Bondi's review regarding the [Jeffrey] Epstein matter.
2. All briefing materials (such as memoranda, talking points, or emails summarizing key information) prepared for Attorney General Bondi for her meetings with President Trump regarding the [Jeffrey] Epstein matter, including her May 2025 meeting at the White House.

32. Part (1) of the request sought records compiled or prepared from January 20, 2025, until the date of the search. Part (2) of the request sought records compiled or prepared from March 15, 2025 to May 30, 2025.

33. On July 29, 2025, DOJ's Mail Referral Unit ("MRU") acknowledged this request and assigned it tracking number EMRUFOIA072525-6. MRU noted that it had referred this request to the following DOJ components: (1) Office of Information Policy ("OIP"); (2) Executive Office for U.S. Attorneys ("EOUSA"); and (3) the FBI.

²⁵ See Donald J. Trump (@realDonaldTrump), Truth Social (Nov. 19, 2025, 8:20 pm), <https://truthsocial.com/@realDonaldTrump/posts/115579394833948106> ("I HAVE JUST SIGNED THE BILL TO RELEASE THE EPSTEIN FILES!").

34. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005365.

35. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP.

36. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06131.

37. DFF has received no further communication regarding this request.

DOJ Senior Leadership Communications Request

38. On July 25, 2025, DFF sent a request to DOJ for the following:

1. All records reflecting 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, and summaries of oral communications) of (a) the DOJ officials below regarding (b) the [Jeffrey] Epstein matter, including records reflecting correspondence between Trump and Epstein.

DOJ Officials:

- I. Attorney General Pam Bondi
 - II. Deputy Attorney General Todd Blanche
 - III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
 - IV. Chief of Staff Chad Mizelle
 - V. Anyone serving as Advisor or Senior Advisor to the Attorney General
 - VI. Anyone serving as Chief of Staff to the Deputy Attorney General
 - VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General
2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the DOJ officials included in Item 1 containing any of the key terms listed below.

Key Terms:

- I. “Client List”

- II. Epstein
- III. “Flight Logs”
- IV. “Ghislaine Maxwell”
- V. Whistleblower

39. This request sought all records from January 20, 2025, until the date of the search.

40. On July 29, 2025, DOJ’s MRU acknowledged this request and assigned it tracking number EMRUFOIA072525-7. MRU noted that it had referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

41. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005366.

42. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP.

43. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06130.

44. DFF has received no further communication regarding this request.

FBI Senior Leadership Communications Request

45. On July 25, 2025, DFF sent a request to the FBI for the following:

1. All records reflecting 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, and summaries of oral communications) of [(a)] the FBI officials below regarding (b) the [Jeffrey] Epstein matter, including records reflecting correspondence between Trump and Epstein.

FBI Officials:

- I. Director Kash Patel
- II. Deputy Director Dan Bongino
- III. Associate Deputy Director J. William Rivers
- IV. Anyone serving as Chief of Staff to the Director

- V. Anyone serving as Advisor or Senior Advisor to the Director
- VI. Anyone serving as Chief of Staff to the Deputy Director
- VII. Anyone serving as Advisor or Senior Advisor to the Deputy Director

- 2. All email communications (including email messages, complete email chains, email attachments, calendar invitations) sent by the FBI officials included in Item 1 containing any of the key terms listed below.

Key Terms:

- I. “Client List”
- II. Epstein
- III. “Flight Logs”
- IV. “Ghislaine Maxwell”
- V. Whistleblower

46. This request sought all records from January 20, 2025 until the date of the search.

47. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request. On August 13, 2025, the FBI acknowledged this request and assigned it tracking number 1676989-000. The FBI informed DFF that “unusual circumstances” would delay the FBI’s ability to make a determination on DFF’s request within FOIA’s deadline of 20 working days.

48. DFF has received no further communication regarding this request.

FBI Records Review Request

49. On July 25, 2025, DFF sent a request to the FBI for the following:

- 1. All directives, guidance, and instructions provided from (a) agency political appointees or other leadership to (b) agency personnel designated to the Information Management Division to assist with the Epstein-related records review between March 14, 2025 and March 30, 2025, including “flagging” any reference to President Trump in the records.
- 2. Records reflecting all staff assigned to review Epstein-related records, such as a list of agent names; calendar entries of

participants, or email including email addresses reflecting those staff.

3. All records reflecting all mentions of President Trump within the Epstein-related records review that took place between March 14, 2025 and March 30, 2025.

50. This request sought all records from March 14, 2025, until the date of the search.

51. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request.

52. On August 20, 2025, the FBI FOIA public liaison directed DFF to coordinate with a DOJ attorney, but did not provide a tracking number for this request.

53. DFF has received no further communication regarding this request.

Communications between DOJ and FBI Request (Defendants DOJ, FBI)

54. On July 25, 2025, DFF sent an identical FOIA request separately to DOJ and the FBI asking that each respectively produce the following:

1. All records reflecting 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, and summaries of oral communications) between or among (a) any of the DOJ officials below and (b) any of the FBI officials below, regarding the Jeffery Epstein matter, including records reflecting correspondence between Trump and Epstein.

DOJ Officials:

- I. Attorney General Pam Bondi
- II. Deputy Attorney General Todd Blanche
- III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
- IV. Chief of Staff Chad Mizelle
- V. Anyone serving as Advisor or Senior Advisor to the Attorney General
- VI. Anyone serving as Chief of Staff to the Deputy Attorney General
- VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General

FBI Officials:

- I. Director Kash Patel
 - II. Deputy Director Dan Bongino
 - III. Associate Deputy Director J. William Rivers
 - IV. Anyone serving as Chief of Staff to the Director
 - V. Anyone serving as Advisor or Senior Advisor to the Director
2. All records reflecting 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, and summaries of oral communications) between (a) any of the DOJ or FBI officials below and (b) White House Press Secretary Karoline Leavitt, including any @who.eop.gov email address associated with her, regarding the Jeffrey Epstein matter, including records reflecting correspondence between Trump and Epstein.

DOJ/FBI Officials:

- I. Attorney General Pam Bondi
- II. Deputy Attorney General Todd Blanche
- III. Anyone serving as Associate Attorney General or Acting Associate Attorney General
- IV. Chief of Staff Chad Mizelle
- V. Anyone serving as Advisor or Senior Advisor to the Attorney General
- VI. Anyone serving as Chief of Staff to the Deputy Attorney General
- VII. Anyone serving as Advisor or Senior Advisor to the Deputy Attorney General
- VIII. Director Kash Patel
- IX. Deputy Director Dan Bongino
- X. Associate Deputy Director J. William Rivers
- XI. Anyone serving as Chief of Staff to the Director
- XII. Anyone serving as Advisor or Senior Advisor to the Director

55. This request sought all records from January 20, 2025, until the date of the search.

56. On July 25, 2025, DFF received an automatic email from the FBI acknowledging receipt of this request.

57. On July 29, 2025, DOJ's MRU acknowledged this request and assigned it tracking number EMRUFOIA072525-8. MRU referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

58. On July 31, 2025, EOUSA acknowledged this request and assigned it tracking number EOUSA-2025-005367.

59. On August 1, 2025, EOUSA clarified that it had assessed it does not maintain the information sought by this request and therefore had rerouted this request to OIP and the FBI.

60. On August 7, 2025, OIP acknowledged this request and assigned it tracking number FOIA-2025-06129.

61. On August 13, 2025, the FBI acknowledged this request and assigned it tracking number 1676988-000. The FBI informed DFF that "unusual circumstances" would delay the FBI's ability to make a determination on DFF's request within FOIA's deadline of 20 working days.

62. DFF has received no further communication regarding this request.

Communications between Trump and Epstein Request (Defendants DOJ, FBI)

63. On July 28, 2025, DFF sent an identical FOIA request separately to MRU, OIP, EOUSA, Criminal Division ("CRM"), and the FBI asking that each respectively produce the following on an expedited basis:

All records reflecting all correspondence between Donald J. Trump and Jeffrey Epstein.

64. This request sought all records from January 1, 1990 until the date of the search. The request noted public reporting indicating that responsive records have likely been reviewed since January 20, 2025, including in March 2025.²⁶

²⁶ See, e.g., Nnamdi Egwuonwu, *FBI Personnel Were Told to Flag Epstein Files Mentioning Trump*, *Senate Democrat Says*, NBC News (Jul. 18, 2025),

65. On July 28, 2025, EOUSA acknowledged receipt of DFF's request and assigned it tracking number EOUSA-2025-005320.

66. On July 29, 2025, EOUSA informed DFF that it had assigned DFF's request to the "complex track" for processing and was extending the time limit to respond due to "unusual circumstances."

67. On August 1, 2025, MRU acknowledged this request and assigned it tracking number EMRUFOIA072825-8. MRU noted that it had referred this request to the following DOJ components: (1) OIP; (2) EOUSA; and (3) the FBI.

68. On August 7, 2025, OIP acknowledged receipt of DFF's request and assigned it tracking number FOIA-2025-06100.

69. On August 8, 2025, CRM acknowledged DFF's request and assigned it tracking number CRM-302323701.

70. On August 13, 2025, the FBI acknowledged this request and assigned it tracking number 1677025-000.

71. On December 4, 2025, EOUSA sent DFF a letter rerouting the request to OIP.

72. DFF has received no further communication regarding this request.

Expedited Processing of DFF's FOIA Requests

73. In connection with each FOIA request described above, on July 28, 2025, DFF submitted a request for expedited processing directly to DOJ's MRU, OIP, EOUSA, CRM, and the FBI.

<https://www.nbcnews.com/politics/congress/fbi-personnel-jeffrey-epstein-files-mentioning-trump-dick-durbin-says-rcna219699>.

74. On August 8, 2025, DFF filed suit against DOJ and the FBI to compel the agencies to grant expedited processing of the requests. *See* Compl., *DFF v. DOJ, et al.*, 25-cv-2597-TSC (D.D.C. Aug. 8, 2025), ECF No. 1.

75. On August 11, 2025, DFF moved for summary judgment on the expedited processing issue and asked the court to order the DOJ and FBI to expedite processing of DFF's above described FOIA requests. *See* Pl.'s Mot. for Summ. J., *DFF v. DOJ, et al.*, 25-cv-2597-TSC (D.D.C. Aug. 8, 2025), ECF No. 4.

76. On November 24, 2025, Judge Chutkan ordered the DOJ and FBI to expedite processing of DFF's FOIA requests described above, except with respect to the search terms "whistleblower" and "flight logs" in the DOJ and FBI Senior Leadership Communications requests. *See* Order, *DFF v. DOJ, et al.*, 25-cv-2597-TSC (D.D.C. Nov. 24, 2025), ECF No. 18. DOJ and FBI are now required to process these requests in an expedited manner in accordance with this order.

77. DFF had filed a motion to amend the complaint in *DFF v. DOJ, et al.*, 25-cv-2597-TSC, in order to include subsequent allegations that the DOJ and FBI had not complied with statutory deadlines to issue determinations and produce non-exempt portions of responsive records. The court, however, ruled on the pending motion for summary judgment regarding expedited processing before granting that motion to amend. Defendants DOJ and the FBI objected to proceeding with a motion to amend the complaint in that matter after the summary judgment ruling and stated that a new complaint would be required to adjudicate Plaintiff's claims for the DOJ and FBI's failure to produce records responsive to DFF's requests.

78. DFF here files this complaint to ensure that Defendants DOJ and the FBI produce the non-exempt portions of the records requested described above on an expedited basis.

Exhaustion of Administrative Remedies

79. An agency must determine within 20 working days of, or within 30 working days in “unusual circumstances,” after receipt of a records request, whether to comply with the request and notify the requester of that determination. 5 U.S.C. §§ 552(a)(6)(A)(i), (B)(i). An agency’s failure to timely respond to a records request is subject to judicial review. *Id.* § 552(a)(6)(C)(i).

80. DFF submitted the FOIA requests described herein on July 25 and 28, 2025. As of the date of this Complaint, Defendants have failed to notify DFF of determinations regarding these requests. Through Defendants’ failure to respond, DFF has constructively exhausted administrative remedies on these requests and those failures are subject to judicial review.

CLAIM FOR RELIEF

Count 1 (Violation of FOIA, 5 U.S.C. § 552, Failure to Produce Nonexempt Responsive Records)

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

2. By failing to respond to Plaintiff’s records requests with determinations 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 adequate 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 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: December 8, 2025

Respectfully submitted,

/s/ Daniel A. McGrath

Daniel A. McGrath
(D.C. Bar No. 1531723)
Amy C. Vickery*
(*pro hac vice forthcoming)
Robin F. Thurston
(D.C. Bar No. 7268942)
Democracy Forward Foundation
P.O. Box 34553
Washington, D.C. 20043
(202) 448-9090
dmcgrath@democracyforward.org
avickery@democracyforward.org
rthurston@democracyforward.org

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS Democracy Forward Foundation (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES) (c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) Daniel McGrath, Amy Vickery, Robin F. Thurston Democracy Forward Foundation P.O. Box 34553, Washington, D.C. 20043 202-448-9090	DEFENDANTS United States Department of Justice, Federal Bureau of Investigation COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT _____ (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>																								
II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY) <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input type="radio"/> 1 U.S. Government Plaintiff </div> <div style="width: 48%;"> <input type="radio"/> 3 Federal Question (U.S. Government Not a Party) </div> </div> <div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input checked="" type="radio"/> 2 U.S. Government Defendant </div> <div style="width: 48%;"> <input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III) </div> </div>	III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY! <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
	PTF	DFT		PTF	DFT																				
Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4																				
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 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)

<input type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input type="radio"/> B. Personal Injury/Malpractice <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="radio"/> 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)*
<input type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil			
<u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)

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

VII. REQUESTED IN COMPLAINT	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ JURY DEMAND:	Check YES only if demanded in complaint YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	If yes, please complete related case form

DATE: 12/8/2025	SIGNATURE OF ATTORNEY OF RECORD /s/ Daniel McGrath
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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.

U.S. Department of Justice, Federal Bureau of Investigation

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

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

U.S. Department of Justice
950 Pennsylvania Ave NW
Washington, DC 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, DC 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. _____

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. Department of Justice, Federal Bureau of Investigation

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

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

Federal Bureau of Investigation
935 Pennsylvania Ave NW
Washington, DC 20535

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, DC 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. _____

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. Department of Justice, Federal Bureau of Investigation

Defendant

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Civil Action No.

SUMMONS IN A CIVIL ACTION

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

Pam Bondi, in her official capacity as U.S. Attorney General
950 Pennsylvania Ave NW
Washington, DC 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, DC 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. _____

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. Department of Justice, Federal Bureau of Investigation

Defendant

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)
)
)
)

Civil Action No.

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, DC 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, DC 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. _____

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: