

**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. 26-cv-

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES
5900 Capital Gateway Dr.
Camp Springs, MD 20746,

U.S. DEPARTMENT OF HOMELAND
SECURITY
2707 Martin Luther King Jr Ave, SE
Washington, DC 20528, and

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

Defendants.

COMPLAINT FOR INJUNCTIVE RELIEF

Plaintiff Democracy Forward Foundation (“DFF”) brings this action against Defendants U.S. Citizenship and Immigration Services (“USCIS”), U.S. Department of Homeland Security (“DHS”), and U.S. Department of Justice (“DOJ”) 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 at least one of the 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 U.S. Citizenship and Immigration Services ("USCIS") is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Camp Springs, Maryland. USCIS has possession, custody, and control of records to which Plaintiff seeks access.

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

6. Defendant U.S. Department of Justice ("DOJ") is a federal agency within the meaning of FOIA, 5 U.S.C. § 552(f)(1), and is headquartered in Washington, D.C. The Civil Division ("CIV"), the Executive Office of U.S. Attorneys ("EOUSA"), and the Office of Information Policy ("OIP") are components of DOJ. DOJ has possession, custody, and control of records to which Plaintiff seeks access.

Facts

7. Since 2025, the Trump-Vance administration has reportedly sought to substantially expand efforts to denaturalize naturalized United States citizens. Reporting has described denaturalization as a significant priority of the administration and has detailed efforts by federal officials to identify and pursue larger numbers of denaturalization cases.¹

8. News reports have further described proposals to increase denaturalization referrals and litigation, including through enhanced coordination among components of the DHS and DOJ, and have also identified senior administration officials, including White House Deputy Chief of Staff Stephen Miller, as advocates of more aggressive immigration-enforcement initiatives and expanded use of existing statutory authorities to increase denaturalizations.²

9. Commentators and legal experts have characterized expanded denaturalization efforts as among the most consequential immigration policies pursued by the current administration.³ These reports have generated substantial public concern because denaturalization

¹ See e.g., Hamed Aleaziz, *Trump Administration Aims to Strip More Foreign-Born Americans of Citizenship*, N.Y. TIMES (Dec. 17, 2025), <https://perma.cc/2X3C-QXN5>; Jason Lalljee, *What to know about the DOJ revoking citizenship of naturalized citizens*, AXIOS (updated July 2, 2025), <https://perma.cc/EM8H-TD9J>; Jasper Ward, *Trump administration seeks to ramp up denaturalization of some US citizens*, *New York Times report*, Reuters (updated Dec. 17, 2025), <https://perma.cc/U9EQ-GAVX>.

² See e.g., Ted Hesson et al, *Trump to forge ahead with immigration crackdown driven by top aide Stephen Miller*, Reuters (updated Mar. 6, 2026), <https://perma.cc/HTH2-CWVT>; Ted Hesson, *What do the numbers show about Trump's immigration enforcement record?*, Reuters (Updated Apr. 22, 2026), <https://perma.cc/4HT8-6RSM>; Ernesto Londono & Hamed Aleaziz, *Justice Dept. Targets Hundreds of Citizens in New Push for Denaturalization*, N.Y. TIMES (Apr. 23, 2026), <https://perma.cc/FYW7-3AB4>; Jaclyn Diaz & Juliana Kim, *DOJ announces plans to prioritize cases to revoke citizenship*, NPR (June 30, 2026), <https://perma.cc/ZR8X-H4PU>.

³ See e.g., Faiza Patel & Margy O'Herron, *Stripping Naturalized Americans of Citizenship Faces High Legal Hurdles*, BRENNAN CENTER FOR JUSTICE (Oct. 24, 2025), <https://perma.cc/7HP5-KK38>; Nik Popli, *Can a U.S. Citizen Be Deported? Trump's Comments Raise Legal Alarms*, TIME (Apr. 15, 2025), <https://perma.cc/3G6V-XEZJ>.

proceedings can result in the loss of United States citizenship and may affect an individual's legal status and ability to remain in the United States.

10. To inform the public about these matters of public interest, DFF submitted multiple FOIA requests to USCIS, EOUSA, the Civil Division, and OIP seeking records concerning denaturalization initiatives, referrals, litigation, agency coordination, communications among senior officials, and related policy discussions.

USCIS Tactical Operations Division Key Terms Request (COW2026005243)

11. On April 29, 2026, DFF sent a FOIA request to USCIS seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such as Slack or Microsoft Teams, and direct messages on social media platforms such as Truth Social or X) sent by the individuals listed below (A) containing any of the below key terms (B):

(A) Agency officials

- a. Daniel Andrade
- b. Anyone serving in the capacity of chief, division chief, including in an acting role, of the Tactical Operations Division, including Daniel Andrade
- c. Anyone serving in the capacity of deputy chief or deputy division chief, including in an acting role, of the Tactical Operations Division
- d. Anyone serving in the capacity of chief of staff of the Tactical Operations Division

(B) Key Terms

- a. Denaturalize
- b. Denaturalization
- c. Denat
- d. Denatz
- e. Quota
- f. "Cases per month"
- g. "Referrals per month"
- h. "8 U.S.C. 1451"

- i. "8 USC 1451"
- j. "INA § 340"
- k. "Unlawfully procure"
- l. "Naturalize" AND "fraud"
- m. "Naturalized" AND "fraud"
- n. "Citizen" AND "fraud"
- o. "Citizens" AND "fraud"
- p. "Citizenship" AND "fraud"
- q. FDNS
- r. "Stephen Miller"
- s. H.S.A.
- t. HSA
- u. Stephen.miller
- v. s.miller
- w. Salisbury

In an effort to accommodate the USCIS and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the officials named above (A). To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both an agency official's response to an email and the initial received message are responsive to this request and should be produced.

If USCIS is unable to perform Boolean searches as specified by terms m-r, DFF is willing to negotiate our key terms list.

- 12. This request sought records from January 20, 2025, through the date of the search.
- 13. On June 5, 2026, USCIS acknowledged this request, granted DFF's fee waiver, assigned it to the complex track, and assigned it tracking number COW2026005243.
- 14. DFF has not received any further communication from USCIS regarding this request.

USCIS Denaturalization Communications Request (COW2026005268)

- 15. On April 29, 2026, DFF sent a FOIA request to USCIS seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such

as Slack or Microsoft Teams, and direct messages on social media platforms such as Truth Social or X) sent by any of the agency staff listed below regarding denaturalization initiatives.

Agency staff:

1. Director Joseph Edlow
 2. Deputy Director (including in any previous capacity as Acting Director) Angelica Alfonso-Royals
 3. Acting Chief of Staff Peter Holland
 4. Deputy Chief of Staff Timothy Kaiser
 5. Acting Associate Director, Fraud Detection and National Security Directorate Andrew Davidson
 6. Chief, Office of Policy and Strategy Andrew Good
 7. Anyone serving in the role of Associate Director, Field Operations Directorate, or Acting Associate Director, Field Operations Directorate, including Sarah Kendall
 8. Former Chief of Staff Aaron Calkins
 9. Deputy Director James G. Kernochan
 10. Daniel Andrade
 11. Anyone serving in the capacity of chief, division chief, including in an acting role, of the Tactical Operations Division, including Daniel Andrade
 12. Anyone serving in the capacity of deputy chief or deputy division chief, including in an acting role, of the Tactical Operations Division
 13. Anyone serving in the capacity of chief of staff of the Tactical Operations Division
16. This request sought records from January 20, 2025, through the date of the search.
17. On June 9, 2026, USCIS acknowledged this request, granted DFF's fee waiver, assigned it to the complex track, and assigned it tracking number COW2026005268.
18. DFF has not received any further communication from USCIS regarding this request.
- USCIS Organization, Policies, and Directives Request (COW2026005269)*
19. On April 29, 2026, DFF sent a FOIA request to USCIS seeking the following:

- (1) Records reflecting the organization and operations of the Tactical Operations Division within USCIS. Press reporting indicates at a minimum that a USCIS document outlines the team components and leadership of the Division.⁴ [FN in original]
- (2) All records reflecting policies, memoranda, directives, field guides, training materials, standard operating procedures, or emailed instructions sent to the chief or division chief of the Tactical Operations Division or any of its component teams, including but not limited to Legal Permanent Resident (LPR) Operations, Denaturalization, Refugee Re-Vetting, or Fraud Detection & National Security.

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

21. On June 5, 2026, USCIS acknowledged this request, granted DFF's fee waiver, assigned it to the complex track, and assigned it tracking number COW2026005269.

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

USCIS Guidance and Key Terms Communications Request (COW2026000324)

23. On February 4, 2026, DFF sent a FOIA request to USCIS seeking the following:

(1) All operational or policy guidance, memoranda, or other records in possession of the Field Operations Directorate containing or referencing denaturalization, including, but not limited to, quotas for denaturalization cases or requests to identify or process a certain number of denaturalization cases per month.

(2) All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such as Slack or Microsoft Teams, and

⁴ See, e.g., Jonathan Blitzer (@JonathanBlitzer), X (Apr. 19, 2026, 9:11 PM), <https://perma.cc/8GCK-NSSH>.

direct messages on social media platforms such as Truth Social or X) sent by the individuals listed below (A) containing any of the below key terms (B):

(A) Agency officials:

- a. Anyone serving in the role of Associate Director, Field Operations Directorate, or Acting Associate Director, Field Operations Directorate, including Sarah Kendall
- b. Former Chief of Staff Aaron Calkins
- c. Deputy Director James G. Kernochan

(B) Key terms:

- a. Denaturalize
- b. Naturalize
- c. Naturalized
- d. Denaturalization
- e. Denat
- f. Denatz
- g. Quota
- h. "Cases per month"
- i. "Referrals per month"
- j. "Operation Second Look"
- k. OSL
- l. Revoke
- m. Revocation
- n. "8 U.S.C. 1451"
- o. "8 USC 1451"
- p. "INA § 340"
- q. "Unlawfully procure"
- r. "Enforcement Section"
- s. "Mike Davis"
- t. article3project.org
- u. Somali
- v. Somalis
- w. cis.org

In an effort to accommodate USCIS and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the officials named above (A). To be clear, however, DFF still requests that

complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both an agency official's response to an email and the initial received message are responsive to this request and should be produced.

24. This request sought records from January 20, 2025, through the date of the search.
25. On February 17, 2026, USCIS acknowledged this request, granted DFF's fee waiver, assigned it to the complex track, and assigned it tracking number COW2026000324.
26. DFF has not received any further communication from USCIS regarding this request.

CIV Key Terms Request (145-FOI-26-22673)

27. On January 22, 2026, DFF sent a FOIA request to CIV seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such as Slack or Microsoft Teams, and direct messages on social media platforms such as Truth Social or X) sent by the individuals listed below (A) containing any of the below key terms (B):

(A) Agency officials:

- a. Assistant Attorney General (including in previous capacity as Principal Deputy Assistant Attorney General) Brett Shumate
- b. Principal Deputy Assistant Attorney General Yaakov M. Roth
- c. Deputy Assistant Attorney General Drew Ensign
- d. August Flentje, including in his capacity as Acting Director, Deputy Director for Immigration Litigation, Attorney, and Special Counsel for Immigration
- e. Associate Director Jennifer Keeney
- f. Chief of the Enforcement Unit John Inkeles
- g. Deputy Chief of the Enforcement Unit Hans Chen
- h. Acting Director of the Office of Immigration Litigation Anthony Nicastro
- i. Acting Deputy Director for District Court Litigation Glenn Girdharry
- j. Chief of Staff Russel Verby

(B) Key terms:

- a. Denaturalize
- b. Naturalize
- c. Naturalized
- d. Denaturalization
- e. Denat
- f. Denatz
- g. Quota
- h. “Cases per month”
- i. “Referrals per month”
- j. “Operation Second Look”
- k. Revoke
- l. Revocation
- m. “8 U.S.C. 1451”
- n. “8 USC 1451”
- o. “Unlawfully procure”
- p. “Enforcement Section”
- q. “Mike Davis”
- r. article3project.org
- s. Somali
- t. Somalis
- u. cis.org

In an effort to accommodate the DOJ and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the officials named above (A). To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both an agency official’s response to an email and the initial received message are responsive to this request and should be produced.

Reporting has indicated that government officials may be using personal devices to conduct government business, and that they are also using non-government messaging applications such as Signal.⁵ [FN in original] As such, a search for responsive records must

⁵ See, e.g., Jeffrey Goldberg, *The Trump Administration Accidentally Texted Me Its War Plans*, THE ATLANTIC (Mar. 24, 2025), <https://perma.cc/5CDD-WYKF>; Steve Witkoff (@SteveWitkoff), X (Mar. 26, 2025, 9:20 AM), <https://perma.cc/ZY3L-YZDU>.

include both official and personal devices and applications such as Signal, iMessage, and WhatsApp.

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

29. On June 18, 2026, CIV acknowledged this request, assigned it to the complex track, and assigned it tracking number 145-FOI-26-22673.

CIV Guidance and MOUs Request (145-FOI-26-22674)

30. On January 22, 2026, DFF sent a FOIA request to CIV seeking the following:

(1) All guidance, memoranda, or other records in possession of your agency containing or reflecting quotas for denaturalization cases or requests to identify or process a certain number of denaturalization cases per month.

(2) All memoranda of agreement (MOAs) between U.S. Citizenship and Immigration Services and the Office of Immigration Litigation at the Department of Justice regarding denaturalization cases.

(3) All guidance, memoranda, directives, instructions, or other records in possession of your agency explaining (1) how to prioritize denaturalization cases or (2) how to compile a list of denaturalization cases to supply to the Office of Immigration Litigation at the Department of Justice.

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

32. On June 18, 2026, CIV acknowledged this request, assigned it to the complex track, and assigned it tracking number 145-FOI-26-22674.

Yamileth Davila Communications Request

33. On April 29, 2026, DFF sent a FOIA request to CIV and OIP seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such as Slack or Microsoft Teams, and direct messages on social media platforms such as Truth Social or X) sent by the individuals listed below (A) containing any of the below key terms (B):

(A) Agency officials:
a. Yamileth Davila

(B) Key terms:
a. Denaturalize
b. Naturalize
c. Naturalized
d. Denaturalization
e. Denat
f. Denatz
g. Quota
h. "Cases per month"
i. "Referrals per month"
j. "8 U.S.C. 1451"
k. "8 USC 1451"
l. "INA § 340"
m. "Unlawfully procure"
n. "Stephen Miller"
o. H.S.A.
p. HSA
q. Stephen.miller
r. s.miller
s. Salisbury

In an effort to accommodate the DOJ and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the officials named above (A). To be clear, however, DFF still requests that complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both an agency official's response to an email and the initial received message are responsive to this request and should be produced.

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

35. On April 30, 2026, OIP acknowledged this request, assigned it to the complex track, and assigned it tracking number FOIA-2026-02974.

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

37. On May 19, 2026, CIV acknowledged this request, assigned it to the complex track, and assigned it tracking number 145-FOI-26-22729.

38. DFF has not received any further communication from CIV regarding this request.

EOUSA Key Terms Request (EOUSA-2026-003352)

39. On April 29, 2026, DFF sent a FOIA request to EOUSA seeking the following:

All electronic communications (including emails, email attachments, complete email chains, calendar invitations, calendar invitation attachments, text messages or messages on applications such as Signal or Whatsapp, messages on messaging platforms such as Slack or Microsoft Teams, and direct messages on social media platforms such as Truth Social or X) sent by the individuals listed below (A) containing any of the below key terms (B):

(A) Agency officials:

- a. Anyone serving in the role of director or acting director of the Executive Office for U.S. Attorneys, including Francey Hakes

(B) Key terms:

- a. Denaturalize
b. Naturalize
c. Naturalized
d. Denaturalization
e. Denat
f. Denatz
g. Quota
h. "Cases per month"
i. "Referrals per month"
j. "8 U.S.C. 1451"
k. "8 USC 1451"
l. "INA § 340"
m. "Unlawfully procure"
n. "Stephen Miller"
o. H.S.A.
p. HSA
q. Stephen.miller
r. s.miller
s. Salisbury
t. Yami
u. Yamileth
v. Davila

In an effort to accommodate the DOJ and reduce the number of potentially responsive records to be processed and produced, we have limited this request to communications sent by the officials named above (A). To be clear, however, DFF still requests that

complete email chains and texts be produced, displaying both sent and received messages. This means, for example, that both an agency official's response to an email and the initial received message are responsive to this request and should be produced.

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

41. On April 29, 2026, EOUSA assigned this request tracking number EOUSA-2026-003352 in an automated email.

42. On April 30, 2026, EOUSA acknowledged this request, and assigned it to the complex track.

43. DFF has not received any further communication from EOUSA regarding this request.

Exhaustion of Administrative Remedies

44. As of the date of the Complaint, Defendants have failed to notify DFF of determinations regarding DFF's requests. Through Defendants' 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)

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

46. 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: June 26, 2026

Respectfully submitted,

/s/ Anisha Hindocha

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Daniel A. McGrath
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