IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC., 425 Third Street SW, Suite 800 Washington, DC 20024, Plaintiff, v. CENTRAL INTELLIGENCE AGENCY, Office of General Counsel Washington, DC 20505, Defendant.	)	Civil Action No.

COMPLAINT

Plaintiff, Judicial Watch, Inc. ("Plaintiff") brings this action against Defendant Central Intelligence Agency ("Defendant") to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). As grounds therefor, Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. The 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 in this district pursuant to 28 U.S.C. § 1391(e).

PARTIES

3. Plaintiff Judicial Watch, Inc. is a not-for-profit, educational organization incorporated under the laws of the District of Columbia and headquartered at 425 Third Street SW, Suite 800, Washington, DC 20024. Plaintiff seeks to promote transparency, accountability, and integrity in government and fidelity to the rule of law. As part of its mission, Plaintiff regularly requests records from federal agencies pursuant to FOIA. Plaintiff analyzes the

responses and disseminates its findings and the requested records to the American public to inform them about "what their government is up to."

4. Defendant Central Intelligence Agency is an agency of the U.S. Government and is headquartered in Langley, Virginia. The CIA has possession, custody, and control of records to which Plaintiff seeks access.

STATEMENT OF FACTS

5. On July 9, 2025, Plaintiff submitted a FOIA request to Defendant, via Defendant's online FOIA portal at CIA.gov, seeking access to:

1. Intelligence Activities and Connections:

- Any records indicating whether Jeffrey Epstein was ever an asset, informant, or operative for the CIA or any other U.S. or foreign intelligence agency.
- Communications or agreements between the CIA and Epstein regarding intelligence-related activities, including but not limited to information sharing, national security matters, or covert operations.
- Any assessments, evaluations, or reports analyzing Epstein's potential connections to foreign intelligence services, including but not limited to those of Israel, Russia, or the United Kingdom.

2. Financial and Business Activities:

- Records related to Epstein's financial dealings, investments, or business entities (e.g., J. Epstein & Co., Financial Trust Company, or entities based in the U.S. Virgin Islands).
- Any intelligence reports or analyses concerning Epstein's wealth accumulation, estimated at approximately $560 million at the time of his 2019 arrest, particularly any unexplained sources of income or financial transactions with foreign entities or individuals.

3. Associations and Networks:

- Records documenting Epstein's interactions with high-profile individuals, including but not limited to politicians, business

executives, royalty, or other prominent figures, where such interactions were of interest to the CIA due to national security or intelligence concerns.
- Records about Epstein's so-called "Black Book" or contact lists, particularly those indicating CIA awareness of or interest in his network of associates.
- Records about Epstein's properties, including his residences in New York, Florida, New Mexico, Paris, or the U.S. Virgin Islands (e.g., Little St. James), that may have been referenced in CIA surveillance, reports, or investigations.

4. Criminal Investigations and Legal Proceedings:

- Records about coordination or communication with other federal agencies, including the Federal Bureau of Investigation (FBI), Department of Justice (DOJ), or U.S. Marshals Service, regarding Epstein's criminal activities, including his 2006–2008 Florida investigation, his 2019 federal sex-trafficking charges, or related civil litigation.
- Records about Epstein's 2008 non-prosecution agreement with the U.S. Attorney's Office for the Southern District of Florida, including any communications about its implications for national security or intelligence operations.
- Records about Epstein's death on August 10, 2019, at the Metropolitan Correctional Center in New York, including any CIA assessments of conspiracy theories, foreign involvement, or intelligence-related implications of his suicide.

5. Surveillance and Evidence Collection:

- Records of surveillance (physical or electronic) monitoring of Epstein.
- Records about computer hard drives, recording devices, CDs, memory sticks, or other media seized from Epstein's properties (e.g., New York, Florida, or U.S. Virgin Islands) that may have come to the CIA's attention through interagency sharing or intelligence operations.
- Records about materials listed in the DOJ's "Evidence List" from searches of Epstein's properties

6. Foreign Connections and Travel:

- Records about Epstein's international travel, including flight logs for his private aircraft ("Lolita Express").

- Records about any criminal investigations in the U.S. Virgin Islands, particularly his private island (Little St. James), into alleged criminal activities conducted there.

7. Victim and Witness Information (Redacted):

- Records about Epstein's victims or witnesses, with personally identifiable information redacted to protect privacy, that may have been shared with or obtained by the CIA in the course of intelligence or interagency activities.

The time frame for the requested records was identified as January 1, 1990, to July 9, 2025.

6. Defendant's online FOIA portal at CIA.gov indicated that Plaintiff's request was received on the day it was submitted, but Plaintiff received no acknowledgment letter or FOIA tracking number and has had no further communication from Defendant. In Plaintiff's experience submitting FOIA requests to the CIA, the lack of even an acknowledgment of a receipt of a request is typical for the agency, and, on information and believe, the CIA receive the request the same day it was submitted.

7. As of the date of this Complaint, Defendant has failed to: (i) determine whether to comply with the request; (ii) notify Plaintiff of any such determination or the reasons therefor; (iii) advise Plaintiff of the right to appeal any adverse determination; or (iv) produce the requested records or otherwise demonstrate that the requested records are exempt from production.

COUNT I
(Violation of FOIA, 5 U.S.C. § 552)

8. Plaintiff realleges paragraphs 1 through 7 as if fully stated herein.

9. Defendant is in violation of FOIA.

10. Plaintiff is being irreparably harmed by Defendant's violation of FOIA, and Plaintiff will continue to be irreparably harmed unless Defendant is compelled to comply with it.

11. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make a final determination on Plaintiff's request by August 6, 2025, at the latest. Because Defendant failed to make a final determination within the time limits set by FOIA, Plaintiff is deemed to have exhausted its administrative appeal remedies.

WHEREFORE, Plaintiff respectfully requests that the Court: (1) order Defendant to conduct searches for any and all records responsive to Plaintiff's FOIA request and demonstrate that it employed search methods reasonably likely to lead to the discovery of records responsive to Plaintiff's FOIA request; (2) order Defendant to produce, by a date certain, any and all non-exempt records responsive to Plaintiff's FOIA request and *Vaughn* indices of any responsive records withheld under claim of exemption; (3) enjoin Defendant from continuing to withhold any and all non-exempt records responsive to Plaintiff's FOIA request; (4) grant Plaintiff an award of attorneys' fees and other litigation costs reasonably incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E); and (5) grant Plaintiff such other relief as the Court deems just and proper.

Dated: October 9, 2025

Respectfully submitted,

/s/ Paul J. Orfanedes

Paul J. Orfanedes
D.C. Bar No. 429716
JUDICIAL WATCH, INC.
425 Third Street SW, Suite 800
Washington, DC 20024
Tel: (202) 646-5172
Email: porfanedes@judicialwatch.org

Counsel for Plaintiff