IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JUDICIAL WATCH, INC., 425 Third Street S.W., Suite 800 Washington, DC 20024, Plaintiff, v. U.S. DEPARTMENT OF JUSTICE, 950 Pennsylvania Avenue, N.W. Washington, DC 20530-0001, Defendant.	)	Civil Action No.

COMPLAINT

Plaintiff Judicial Watch, Inc. brings this action against Defendant U.S. Department of Justice to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552. 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 S.W., 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 U.S. Department of Justice is an agency of the United States Government and is headquartered at 950 Pennsylvania Avenue, N.W., Washington, DC 20530-0001. Defendant has possession, custody, and control of records to which Plaintiff seeks access.

STATEMENT OF FACTS

5. On August 22, 2025, Plaintiff submitted a FOIA request to the Office of Information Policy ("OIP"), a component of Defendant, seeking access to the following:

1. All records provided to the House Committee on Oversight and Government Reform or any member thereof in response to the subpoena transmitted to Attorney General Bondi on or about August 5, 2025.

2. All records reviewed, referenced, or relied upon during the preparation of any response to the House Committee on Oversight and Government Reform subpoena transmitted to Attorney General Bondi on or about August 5, 2025.

3. All records of communication between Attorney General Bondi or Deputy Attorney General Blanche and any other individual or entity regarding the Department's response to the House Committee on Oversight and Government Reform subpoena transmitted to Attorney General Bondi on or about August 5, 2025.

The timeframe of the request is from January 1, 2025, to the present. The request also referenced a news report to provide further clarification: "For purposes of clarification, please see: https://oversight.house.gov/wpcontent/uploads/2025/08/2025.08.05-Subpoena-Cover-Letters.pdf."

6. By letter dated September 22, 2025, the OIP acknowledged receipt of Plaintiff's request on August 21, 2025 [sic], and advised Plaintiff that the request had been assigned

tracking number FOIA-2025-06520. In the same letter, the OIP invoked FOIA's 10-day extension of time provision for "unusual circumstances."

7. Plaintiff has received no further communication from Defendant.

8. As of the date of this Complaint, Defendant has failed to (i) produce the requested records or demonstrate that the requested records are lawfully exempt from production; (ii) notify Plaintiff of the scope of any responsive records it intends to produce or withhold and the reasons for any withholdings; or (iii) inform Plaintiff that it may appeal any adequately specific, adverse determination.

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

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

10. Defendant is in violation of FOIA.

11. 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 the law.

12. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make a final determination on Plaintiff's request by November 18, 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: November 25, 2025

Respectfully submitted,

/s/ Kathryn Blankenberg

Kathryn Blankenberg
D.C. Bar No. 1781777
JUDICIAL WATCH, INC.
425 Third Street SW, Suite 800
Washington, DC 20024
Tel: (202) 646-5172
Email: kblankenberg@judicialwatch.org

Counsel for Plaintiff