

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT
CIVIL ACTION
DOCKET NO. _____

JUDICIAL WATCH, INC.,)
)
 Plaintiff,)
)
 v.)
)
 CITY OF BOSTON,)
)
 Defendant.)
 _____)

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

Plaintiff Judicial Watch, Inc. brings this action against Defendant City of Boston to compel compliance with the Massachusetts Public Records Law, G.L. c. 66, § 10. Plaintiff alleges:

Jurisdiction and Venue

1. Jurisdiction and venue are proper pursuant to G.L. c. 66, § 10A(c).

Parties

2. Plaintiff Judicial Watch, Inc. is a not-for-profit educational organization incorporated under the laws of and headquartered in Washington, DC. 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 under federal and state “open records” laws, analyzes the responses and any records it receives, and disseminates its findings and the requested records to the public to inform them about “what their government is up to.”

3. Defendant the City of Boston is a municipal corporation that is subject to suit and the Massachusetts Public Records Law. On information and belief, the Defendant has custody of public records requested by Plaintiff.

Statement of Facts

4. On August 20, 2025, Plaintiff submitted a public records request to Defendant seeking access to the following:

- A. All internal emails among Mayor Wu's immediate staff, including Mayor Wu herself, related to an August 13, 2025 letter from US Attorney General Pam Bondi that Mayor Wu have a plan established to work with federal immigration authorities on deportation matters.
- B. All emails sent between Boston Mayor's Office officials related to the appearance of a mariachi band at a rally/press conference on August 19, 2025.
- C. All emails sent between Boston Mayor's Office officials and representatives of Veronica Robles Cultural Center related to the appearance of a mariachi band at an August 19, 2025 press conference.
- D. All budgetary records, including invoices, cancelled check, purchase orders, contracts, agreements and financial entries related to the hiring of a mariachi band for the August 19, 2025 Mayor Wu press conference.

The time frame for the requested records is August 1, 2025 to the present.

5. Defendant subsequently informed Plaintiff that it assigned Plaintiff's request Reference Number R004324-082025 for tracking purposes.

6. On August 21, 2025, Defendant informed Plaintiff that Defendant determined that Plaintiff's request was overly broad and vague and asked Plaintiff to narrow the scope of the request by identifying specific email addresses and specifying precise search terms.

7. That same day, Plaintiff narrowed its request as follows:

With respect to your request below for clarification of the scope of my public records request, it does not appear that the email addresses of the various Mayor's Office officials whose emails I seek are publicly listed. Therefore, it is unreasonable to ask me to furnish those email accounts. However, in the interest of cooperation, please search the following officials' email accounts for the emails I seek in Bullet 1-3:

- Mayor Wu
- Chief of Staff Tiffany Chu
- Chief of Equity and Inclusion Mariangely Solis Cervera
- Corporation Counsel Adam Cederbaum

- Chief of Policy and Strategic Planning Mike Firestone
- Chief of Streets Jascha Franklin-Hodge
- Chief of Economic Opportunity and Inclusion Segun Idowu
- Chief of Community Engagement Brianna Millor
- Chief of Communications Jessica Pierre Senior Advisor for Community Safety Isaac Yablo

The search terms to be used in Bullet 1 searches are “Bondi”, “deportation” and “sanctuary”.

The search term to be used in Bullet 2 searches is “mariachi”.

The search term to be used in Bullet 3 searches is “mariachi” and emails should be sought for communications with any email account ending in the domain @vrocc.org.

8. On August 22, 2025, Defendant acknowledged receiving Plaintiff’s narrowed request.
9. On September 4, 2025, Defendant informed Plaintiff that Defendant needed an additional 15 business days to respond to Plaintiff’s request.
10. As of the date of this Complaint, Defendant has failed to respond to Plaintiff’s public records request.

Count I
(Violation of the Massachusetts Public Records Law)

11. Plaintiff realleges paragraphs 1 through 10 as if fully stated herein.
12. Pursuant to the Massachusetts Public Records Law, Defendant was required to respond to Plaintiff’s request within 25 business days of receipt of Plaintiff’s narrowed request or by September 30, 2025.
13. Because Defendant has failed to produce all records responsive to Plaintiff’s request or demonstrate that the requested records are lawfully exempt from production, Plaintiff is being irreparably harmed and will continue to be irreparably harmed unless Defendant is compelled to comply with the law.

WHEREFORE, Plaintiff respectfully requests that the Court: (1) order Defendant to search for all records responsive to Plaintiff's request; (2) order Defendant to produce, by a date certain, any and all non-exempt records responsive to Plaintiff's request; (3) order Defendant to waive any fee assessed for the production of any and all non-exempt records; (4) enjoin Defendant from continuing to withhold any and all non-exempt records responsive to Plaintiff's request; (5) grant Plaintiff an award of attorneys' fees and other litigation costs reasonably incurred in this action pursuant to G. L. c. 66, § 10A(d)(2); and (6) grant Plaintiff such other relief as the Court deems just and proper.

Dated: December 8, 2025

Respectfully submitted,

/s/ Michael Bekesha
Michael Bekesha (BBO No. 675787)
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