

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

JUDICIAL WATCH, INC.,	)	
425 Third Street SW, Suite 800	)	
Washington, DC 20024,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.
v.	)	
	)	
OFFICE OF THE DIRECTOR OF	)	
NATIONAL INTELLIGENCE	)	
Washington, DC 20511,	)	
	)	
Defendant.	)	
_____	)	

**COMPLAINT**

Plaintiff Judicial Watch, Inc. brings this action against Defendant Office of the Director of National Intelligence 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 Office of the Director of National Intelligence is an agency of the United States Government and is headquartered in Washington, DC 20511. Defendant has possession, custody, and control of records to which Plaintiff seeks access.

### **STATEMENT OF FACTS**

5. On November 20, 2025, Plaintiff submitted a FOIA request to Defendant, seeking access to:

Records and communications of any ODNI employees, contractors, or individuals detailed to ODNI and any of the following individuals that contain these

**keywords:**

coronavirus, COVID 19 (in any form). Severe Acute Respiratory Syndrome, SARS, Wuhan, bats.

The individuals are:

- Ralph Baric – @unc.edu
- Toni Baric – @unc.edu
- Anthony Fauci – @niaid.nih.gov
- Francis Collins – @nih.gov
- Cliff Lane – @niaid.nih.gov
- David Morens – @nih.gov
- Gray Handley – @cdc.gov
- Ping Chen – @cdc.gov
- Dennis Carroll – @usaid.gov
- Peter Daszak – @ecohealthalliance.org
- Aleksei Chmura – @ecohealthalliance.org
- Bob Garry – @tulane.edu
- Linfa Wang – @duke-nus.edu.sg
- Jeremy Farrar – @who.int (current) / @wellcome.org (former)
- Vincent Munster – @nih.gov
- Ian Lipkin – @columbia.edu

The date range for the request was identified as January 1, 2012 to December 31, 2024.

6. By letter dated January 5, 2026, Defendant acknowledged receipt of the request on December 11, 2025, and advised Plaintiff that the request had been assigned ODNI tracking number DF-2026-00166.

7. Plaintiff has received no further communication about the request from Defendant since the January 5, 2026 formal acknowledgment letter.

8. 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)**

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 it.

12. Plaintiff has no adequate remedy at law.

13. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make a final determination on Plaintiff's request by January 13, 2026, 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: April 3, 2026

Respectfully submitted,

/s/ James F. Peterson  
James F. Peterson  
D.C. Bar No. 450171  
JUDICIAL WATCH, INC.  
425 Third Street S.W., Suite 800  
Washington, DC 20024  
Tel: (202) 646-5175  
Email: [jpeterson@judicialwatch.org](mailto:jpeterson@judicialwatch.org)

*Counsel for Plaintiff*