

and disseminates its findings and any 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 United States Government and is headquartered at 1000 Colonial Farm Road, McLean, VA 22101. Defendant has possession, custody, and control of records to which Plaintiff seeks access.

STATEMENT OF FACTS

5. On August 5, 2025, Plaintiff submitted a FOIA request to Defendant seeking access to the following public records:

Unredacted notes taken by former CIA Director John Brennan during the August 3, 2016, White House briefing, which reportedly discussed intelligence regarding a Hillary Clinton campaign plan to link Donald Trump to Russia. This includes any unredacted portions of President Obama’s and FBI Director Comey’s responses, which are currently redacted in publicly available versions of the Durham report.

The date range of the request was identified as August 1, 2016 to the present.

6. By letter dated August 13, 2025, Defendant acknowledged receiving Plaintiff’s request on August 5, 2025 and advised Plaintiff that the request had been assigned Reference Number F-2025-02961.

7. Plaintiff has received no further communication from the Defendant regarding this request.

8. As of the date of this Complaint, Defendant has failed to: (i) determine whether to comply with Plaintiff’s 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 the law.

12. Plaintiff has no adequate remedy at law.

13. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make final determinations on Plaintiff's request by September 3, 2025. Because Defendant failed to issue a final determination on Plaintiff's request 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 a search 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* index 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: May 12, 2026

Respectfully submitted,

/s/ Ramona R. Cotca

Ramona R. Cotca

D.C. Bar No. 501159

JUDICIAL WATCH, INC.

425 Third Street SW, Suite 800

Washington, DC 20024

Tel: (202) 646-5172

Email: rcotca@judicialwatch.org

Attorney for Plaintiff