



regularly requests records from federal agencies pursuant to FOIA. Plaintiff analyzes the agencies' responses and disseminates both 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 Homeland Security is an agency of the U.S. Government and is headquartered at 245 Murray Lane SW, Mailstop 0485, Washington, DC 20528. Defendant has possession, custody, and control of public records to which Plaintiff seeks access.

### **STATEMENT OF FACTS**

5. On February 19, 2026, Plaintiff submitted a FOIA request to the United States Secret Service (USSS), a component of Defendant, seeking access to:

All emails and text messages sent between officials in the U.S. Secret Service and officials in the Office of the White House Counsel, including but not limited to White House Counsel Kathryn Ruemmler, relating to a controversy involving Secret Service officials and other U.S. government employees using the services of prostitutes during an Obama visit to Cartagena, Colombia in 2012.

The time frame for the requested records is April 1, 2012 through December 31, 2014.

The request was submitted via the USSS FOIA Portal.

6. Defendant acknowledged receipt of Plaintiff's request by email dated February 19, 2026, and advised Plaintiff that the request had been assigned FOIA File Number: 2026-USSSFOIA-00658.

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

8. As of the date of this Complaint, Defendant has failed to (i) determine whether to comply with the request; (ii) notify Plaintiff of the scope of any responsive records it intends to

produce or withhold and the reasons for any withholdings; (iii) produce the requested records or demonstrate that the requested records are lawfully exempt from production; or (iv) inform Plaintiff that it may appeal any 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 violating 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 FOIA.

12. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make a final determination on Plaintiff's request by March 19, 2026, at the latest. Because Defendant failed to make a final determination on Plaintiff's request within the time limits required by FOIA, Plaintiff is deemed to have exhausted its administrative appeal remedies.

WHEREFORE, Plaintiff respectfully requests that the Court: (1) order Defendant to 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 request and a *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 6, 2026

Respectfully submitted,

/s/ Kara M. Davis

Kara M. Davis

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