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.	)	
U.S. DEPARTMENT OF JUSTICE, 950 Pennsylvania Avenue, NW Washington, DC 20530, Defendant.	)	

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 ("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 serves FOIA requests on federal agencies, analyzes the responses it receives, and

disseminates its findings and any records to the American public to inform them about "what their government is up to."

4. Defendant U.S. Department of Justice ("Defendant") is an agency of the U.S. Government and is headquartered at 950 Pennsylvania Avenue N.W., Washington, DC 20530. Defendant has possession, custody, and control of public records to which Plaintiff seeks access.

STATEMENT OF FACTS

A. The Office of Information Policy Request

5. On July 10, 2026, Plaintiff submitted a FOIA request to the Office of Information Policy ("OIP"), a component of Defendant, seeking access to the following public records:

> 1. All communications sent or received between the Attorney General, Office of the Attorney General, or Office of the Deputy Attorney General and the SCO, Special Counsel Jack Smith, or any SCO employees/ assignees concerning:
>   a. Security incidents, SCIF access logs, "violation and incident" reports, need-to-know determinations, classified material inventories or movements, compromise assessments, and any related investigations or disciplinary actions related to the alleged classified documents and SCIF security incidents.
> 2. All communications about alleged classified documents and SCIF security incidents involving the following individuals: Carli Rodriguez-Feo (CVR), Julie Edelstein (JAE), William O'Neil (WGO), Stephanie Van Buskirk (SLV), Molly Gaston (MGG), and Thomas Windom (TPW).

The time frame of the request was identified as "November 18, 2022, through the date this request is processed."

6. By letter dated July 28, 2026, the OIP acknowledged receipt of Plaintiff's request on July 10, 2026 and informed Plaintiff that the request had been assigned FOIA-2026-03984.

OIP also advised Plaintiff it had invoked FOIA's 10-day extension of time provision for "unusual circumstances."

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

B. The Justice Management Division Request

8. On July 13, 2026, Plaintiff submitted a FOIA request to the Justice Management Division ("JMD"), a component of Defendant, seeking access to the following public records:

1. All communications sent or received between the JMD Assistant Attorney General for Administration, the Office of the JMD, or JMD's SEPS, and the SCO, Special Counsel Jack Smith, or any SCO employees/assignees concerning:
    a. Classified handling protocols, security incidents, SCIF security policies, SCIF accreditation, SCIF access logs, access controls, "violation and incident" reports, need-to-know determinations, classified material inventories or movements, compromise assessments, and any related investigations or disciplinary actions related to the alleged classified documents and SCIF security incidents.
2. All communications about alleged classified document security and SCIF security incidents involving the following individuals: Carli Rodriguez-Feo (CVR), Julie Edelstein (JAE), William O'Neil (WGO), Stephanie Van Buskirk (SLV), Molly Gaston (MGG), and Thomas Windom (TPW).

The time frame of the request was identified as "November 18, 2022, through the date this request is processed."

9. By email dated July 14, 2026, the JMD acknowledged receipt of Plaintiff's request on July 13, 2026 and informed Plaintiff that the request had been assigned FOIA Tracking Number 139429.

10. Plaintiff has received no further communication from the JMD regarding the request.

C. The National Security Division Request

11. On July 13, 2026, Plaintiff submitted a FOIA request to the National Security Division ("NSD"), a component of Defendant, seeking access to the following public records:

> 1. All communications sent or received between the NSD Assistant Attorney General, the Office of the NSD, or NSD's CES, and the SCO, Special Counsel Jack Smith, or any SCO employees/assignees concerning:
>
> a. Classified handling protocols, security incidents, SCIF access logs, "violation and incident" reports, need-to-know determinations, classified material inventories or movements, compromise assessments, and any related investigations or disciplinary actions related to the alleged classified documents and SCIF security incidents.
>
> 2. All communications about alleged classified documents and SCIF security incidents involving the following individuals: Carli Rodriguez-Feo (CVR), Julie Edelstein (JAE), William O'Neil (WGO), Stephanie Van Buskirk (SLV), Molly Gaston (MGG), and Thomas Windom (TPW).

The time frame of the request was identified as "November 18, 2022, through the date this request is processed."

12. By letter dated July 14, 2026, the NSD acknowledged receipt of Plaintiff's request and informed Plaintiff that the request had been assigned NSD FOIA #26-307.

13. Plaintiff has received no further communication from the NSD regarding the request.

D. The Office of Inspector General Request

14. On July 13, 2026, Plaintiff submitted a FOIA request to the Office of the Inspector General ("OIG"), a component of Defendant, seeking access to the following public records:

> 1. All communications sent or received between the OIG, the Assistant Inspector General, the OIG Investigations Division, or the OIG Audit Division, and the SCO, Special Counsel Jack Smith, or any SCO employees/assignees concerning:

a. Classified handling protocols, security incidents, SCIF security policies, SCIF accreditation, SCIF access logs, access controls, "violation and incident" reports, need-to-know determinations, classified material inventories or movements, compromise assessments, and any related investigations or disciplinary actions related to the alleged classified documents and SCIF security incidents.

2. All communications about alleged classified document security and SCIF security incidents involving the following individuals: Carli Rodriguez-Feo (CVR), Julie Edelstein (JAE), William O'Neil (WGO), Stephanie Van Buskirk (SLV), Molly Gaston (MGG), and Thomas Windom (TPW).

3. All communications, memoranda, or records concerning referrals to the OIG (or any of its components) regarding the matters, incidents, or individuals described in items 1, 1(a), or 2 above.

4. Any other records maintained by the OIG relating to the SCO/SCIF classified security incidents referenced in Senator Grassley's July 8, 2026 release and letter.

The time frame of the request was identified as "November 18, 2022, through the date this request is processed."

15. By letter dated July 17, 2026, the OIG acknowledged receipt of Plaintiff's request on July 13, 2026 and informed Plaintiff that the request had been assigned control number 26-OIG-363.

16. Plaintiff has received no further communication from the OIP regarding the request.

17. As of the date of this Complaint, Defendant has failed to: (i) determine whether to comply with the requests; (ii) notify Plaintiff of any such determinations or the reasons therefor; (iii) advise Plaintiff of the right to appeal any adverse determinations; 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)

18. Plaintiff realleges paragraphs 1 through 17 as if fully stated herein.

19. Defendant is in violation of FOIA.

20. 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.

21. Plaintiff has no adequate remedy at law.

22. To trigger FOIA's administrative exhaustion requirement, Defendant was required to make final determinations on Plaintiff's requests to OIG and JMD by August 10, 2026, on Plaintiff's request to NDS by August 11, 2026, and on Plaintiff's request to OIP by August 21, 2026, at the latest. Because Defendant failed to make final determinations on Plaintiff's requests 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 requests and demonstrate that it employed search methods reasonably likely to lead to the discovery of records responsive to Plaintiff's FOIA requests; (2) order Defendant to produce, by a date certain, any and all non-exempt records responsive to Plaintiff's FOIA requests 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 requests; (4) grant Plaintiff an award of attorney's 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 5, 2026

Respectfully submitted,

/s/ Ramona R. Cotca

Ramona R. Cotca
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