

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICA FIRST LEGAL
FOUNDATION,
611 Pennsylvania Ave SE #231
Washington, DC 20003,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
STATE,
2201 C St NW
Washington, DC 20451,

UNITED STATES SECRET SERVICE,
245 Murray Ln SW, Bldg T-5,
Washington, DC 20223,

UNITED STATES DEPARTMENT OF
THE INTERIOR
1849 C Street, N.W.
Washington, DC 20240,

and

UNITED STATES DEPARTMENT OF
JUSTICE
950 Pennsylvania Ave. NW
Washington, DC 20530,

Defendants.

Civil Action 24-3117

COMPLAINT

1. Plaintiff America First Legal Foundation (“AFL”) brings this action against the United States Department of State to compel compliance with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

JURISDICTION AND VENUE

2. The Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331. Additionally, it may grant declaratory relief pursuant to 28 U.S.C. § 2201 *et seq.*

3. Venue is proper in this District pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391(e).

PARTIES

4. Plaintiff AFL is a nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, ensure due process and equal protection for all Americans, and encourage public knowledge and understanding of the law and individual rights guaranteed under the United States Constitution and the laws of the United States. AFL's mission includes promoting government transparency and accountability by gathering official information, analyzing it, and disseminating it through reports, press releases, and/or other media, including social media platforms, all to educate the public.

5. Defendant United States Department of State is an “agency” within the meaning of 5 U.S.C. § 552(f), with its offices located at 2201 C St NW, Washington, DC 20451. The Department of State has possession and control of the records AFL seeks.

6. Defendant United States Secret Service (“USSS”) is an “agency” within the meaning of 5 U.S.C. § 552(f), with its offices located at 245 Murray Ln SW, Bldg

T-5, Washington, DC 20223. USSS has possession and control of the records AFL seeks.

7. Defendant United States Department of Interior (“DOI”) is an “agency” within the meaning of 5 U.S.C. § 552(f), with its offices located at 1849 C Street, N.W. Washington DC 20240. DOI has possession and control of the records AFL seeks.

8. Defendant United States Department of Justice is an “agency” within the meaning of 5 U.S.C. § 552(f), with its offices located at 950 Pennsylvania Ave. NW, Washington, D.C. 20530. The Department of Justice has possession and control of the records AFL seeks.

FACTS

Department of State, Request F-2024-16207

9. On August 1, 2024, AFL submitted a FOIA request to the United States Department of State seeking records related to the sabotage of the Watergate Complex while Prime Minister Netanyahu was present at the location. *See Ex. 1.*

10. On August 1, 2024, the Department of State emailed AFL, stating that the AFL’s FOIA request had been “Received.” *See Exs. 2, 3.*

11. On August 28, 2024, the Department of State emailed AFL, stating that the AFL’s FOIA request had been split into two requests and stated that the other request, assigned the tracking number F-2024-18956, would be acknowledged by another office. *See Ex. 4.*

12. As of the date of filing, AFL has received no further communications from the Department of State concerning this FOIA request.

Department of State, Request F-2024-18956

13. On August 28, 2024, the Department of State confirmed receipt of the request, assigning the tracking number F-2024-18956. *See Exs. 5, 6.*

14. On September 4, 2024, the Department of State emailed AFL, stating that the Department of State “will not be able to respond within the 20 days provided by the statute due to ‘unusual circumstances.’ See 5 U.S.C. § 552(a)(6)(B)(i)-(iii).” *See Ex. 7.*

15. On September 4, 2024, the Department of State emailed AFL, stating that the request’s status had been updated to “In Process.” *See Ex. 8.*

16. As of the date of filing, AFL has received no further communications from the Department of State concerning this FOIA request.

Department of State, Request F-2024-19919

17. On September 4, 2024, the Department of State emailed AFL stating that request F-2024-18956 had been duplicated “so that it may be processed appropriately.” *See Ex. 9.* It assigned the new request the tracking number F-2024-19919. *Id.*

18. On September 4, 2024, the Department of State emailed AFL, stating that the request’s status had been updated to “Received.” *See Ex. 10, 11.*

19. As of the date of filing, AFL has received no further communications from the Department of State concerning this FOIA request.

United States Secret Service, Request 20241234

20. On August 1, 2024, AFL submitted a FOIA request to USSS seeking records related to the sabotage of the Watergate Complex while Prime Minister Netanyahu was present at the location. *See Ex. 12.*

21. On August 2, 2024, USSS emailed AFL, stating that the request had been updated to received and that it had been assigned the tracking number FOIA-20241234. *See Ex. 13.*

22. As of the date of filing, AFL has received no further communications from USSS concerning this FOIA request.

Department of Interior, Request DOI-NPS-2024-001377

23. On August 1, 2024, AFL submitted a FOIA request to DOI seeking records related to pro-Hamas protests occurring in Washington, DC. *See Ex. 14.*

24. On September 25, 2024, DOI emailed AFL, stating that the request's status had been updated to "Received" and that it had been assigned the tracking number #DOI-NPS-2024-001377. *See Ex. 15.*

25. As of the date of filing, AFL has received no further communications from DOI concerning this FOIA request.

Department of Justice, Request FOIA-2024-00364

26. On November 21, 2023, AFL submitted a FOIA request to DOJ seeking records related to targeted harassment of the American Jewish community and supporters of Israel. *See Ex. 16.*

27. On November 28, 2023, DOJ emailed AFL, stating that the request had been updated to received and that it had been assigned the tracking number FOIA-2024-00364. *See Ex. 17.*

28. DOJ stated that it would “need to extend the time limit to respond to your request beyond the ten additional days provided by the statute.” *See id.*

29. As of the date of filing, AFL has received no further communications from the DOJ concerning this FOIA request.

CLAIM FOR RELIEF

Violation of FOIA, 5 U.S.C. § 552

30. AFL repeats paragraphs 1–29.

31. AFL properly requested records within the possession, custody, and control of the Defendants.

32. The Defendants have failed to produce the requested records within the statutory time limit.

33. Accordingly, AFL has exhausted its administrative remedies. *See* 5 U.S.C. § 552(a)(6)(c)(i).

34. The Defendants have violated the FOIA by failing, within the prescribed time limit, to reasonably search for records responsive to AFL’s FOIA requests and release nonexempt records.

RELIEF REQUESTED

WHEREFORE, AFL respectfully requests this Court:

- i. Declare that the records sought by these requests, as described in the foregoing, must be disclosed pursuant to 5 U.S.C. § 552;
 - ii. Order the Defendants to conduct searches immediately for all records responsive to AFL's FOIA requests and demonstrate that they employed search methods reasonably likely to lead to the discovery of responsive records;
 - iii. Order the Defendants to produce by a date certain all non-exempt records responsive to AFL's FOIA requests, accompanied by a Vaughn index of any responsive records or portions of responsive records being withheld under a claim of exemption.
 - iv. Order the Defendants to grant AFL's requests for fee waivers.
 - v. Award AFL attorney's fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E);
- and
- vi. Grant AFL such other and further relief as this court deems proper
- November 1, 2024.

Respectfully submitted,

/s/ William Scolinos

William Scolinos (DC Bar No. 90023488)

Michael Ding (DC Bar No. 1027252)

(301) 965-0179

AMERICA FIRST LEGAL FOUNDATION

611 Pennsylvania Avenue SE #231

Washington, DC 20003

William.Scolinos@aflegal.org

Counsel for America First Legal Foundation



August 1, 2024

Via FOIA Portal

Office of Information Programs and Services (A/GIS/IPS)
U.S. Department of State
2201 C Street NW
Room B-266
Washington, DC 20520

Freedom of Information Act Request: Pro-Hamas Activity in the Watergate Complex

Dear FOIA Officer:

America First Legal Foundation (AFL) is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) requests on issues of pressing concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL's X page has over 251,000 followers, and the X page of our Founder and President has over 682,000 followers.

I. Records Requested

- A. All records regarding the Diplomatic Security Service's (DSS) protective detail of the Watergate Complex in the District of Columbia on July 24, 2024.
- B. Records sufficient to identify all disciplinary actions taken in response to the events at Watergate Complex in the District of Columbia on July 24, 2024, including the number of agents disciplined and the type of discipline each received.
- C. All records, including electronic communications (which includes, but is not limited to, emails, text messages, Microsoft Teams chat communications, and

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

www.aflegal.org

other instant messaging or text messaging apps), including the words “maggots” or “crickets.”

- D. All records regarding the decision to host Prime Minister Netanyahu at the Watergate Hotel instead of the Blair House.¹
- E. All records regarding the protective detail of the Watergate Complex in the District of Columbia on July 24, 2024, including their responsibility—or lack thereof—to secure the hotel conference room where maggots were released.²
- F. All records regarding any threat to Prime Minister Netanyahu while he was at the Watergate Hotel.³

The time period for this item is July 23, 2024, through the date this request is processed.

II. Custodians

- A. Gentry Smith, Assistant Secretary, DSS
- B. Carlos F. Matus, Principal Deputy Assistant Secretary and Director of the Diplomatic Security Service, DSS
- C. Jackee Schools, Executive Director, DSS
- D. Andrew Wroblewski, Deputy Assistant Secretary and Assistant Director of Diplomatic Security Service Domestic Operations, DSS
- E. Paul R. Houston, Deputy Assistant Secretary and Assistant Director of the Diplomatic Security Service for Threat Investigations and Analysis, DSS
- F. All persons having a supervisory role for the protective detail of the Watergate Complex in the District of Columbia on July 24, 2024

III. Processing and Fee Waiver

Processing should strictly comply with the processing guidance in the Attorney General’s Memorandum on Freedom of Information Act Guidelines.⁴ If you have any

¹ Maureen Groppe et al., *Maggots at the Watergate, Furious Interns on Capitol Hill*, USA TODAY (July 24, 2024), <https://bit.ly/4dlVAws>.

² *Id.* (“Asked why Israeli Prime Minister Benjamin Netanyahu was not staying there, a White House official, speaking on condition of anonymity, said the ‘visit is not one of the categories that lets it be one of the Blair House uses.’ . . . Shortly after the phone conversation with USA TODAY, the official emailed back to say the Blair House is undergoing long-planned renovations, and is ‘not able to accommodate any guests right now.’”).

³ *Id.* (“Abel Trevino, a spokesperson for the center, told USA TODAY there was never any threat to Netanyahu”).

⁴ U.S. DEPT JUST. (Mar. 15, 2022), <https://bit.ly/3zvpxb6>.

questions about our request or believe further discussions regarding search and processing would facilitate the more efficient production of requested records, please contact us at FOIA@aflegal.org.

Per 5 U.S.C. § 552(a)(4)(A)(iii) and your agency's fee waiver regulations, AFL requests a waiver of all search and duplication fees. AFL has a demonstrated ability and intention to effectively convey the information broadly to the public; our status as a representative of the news media has been recognized by other agencies; we have been granted fee waivers by the Departments of State, Defense, Education, Energy, Health and Human Services, Justice, Interior, and Homeland Security. As a non-profit organization, AFL has no commercial interest in this request, which is made entirely to serve the public interest. Finally, disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and of government operations. We are available to provide additional information in writing or offline to support this request. Please contact us immediately if our fee waiver is not granted in full.

IV. Conclusion

To accelerate your release of responsive records, AFL welcomes production on an agreed rolling basis. Please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely,

/s/ Reed Rubinstein

America First Legal Foundation



AFL FOIA <foia@aflegal.org>

Ref: F-2024-16207

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Thu, Aug 1, 2024 at 1:50 PM

Dear Reed Rubinstein:

Thank you for filing your information access request to the U.S. Department of State. Your request number is F-2024-16207.

You will receive a formal acknowledgement to your request in no later than 10 working days. If the Department requires additional information from you, then you will also be notified.

Should you have any questions about your request, you may also contact us at:

FOIAStatus@state.gov

Regards,
Requesters Communications Branch
Office of Information Programs and Services
U.S. Department of State



AFL FOIA <foia@aflegal.org>

Status Update for Request #F-2024-16207 with DOS

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Thu, Aug 1, 2024 at 1:50 PM

Dear Reed Rubinstein,

The status of your FOIA request #F-2024-16207 has been updated to the following status 'Received'. To learn more, please log into the DoS FOIA Portal via the Application URL below.

<https://pal.foia.state.gov>

Regards,
DOS



AFL FOIA <foia@aflegal.org>

Ref: F-2024-16207, Freedom of Information Act Acknowledgement

A_FOIAacknowledgement@groups.state.gov <A_FOIAacknowledgement@groups.state.gov>

Wed, Aug 28, 2024 at
4:49 PM

To: foia@aflegal.org

THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL*

Dear Mr. Rubinstein:

This email acknowledges receipt of your August 1, 2024, Freedom of Information Act (FOIA) (5 U.S.C. § 552) request received by the U.S. Department of State, Office of Information Programs and Services on August 1, 2024.

You are seeking records pertaining to Pro-Hamas Activity in the Watergate complex from July 23, 2024, to the date of process. This Office assigned your request the subject reference number and placed it in the complex processing track where it will be processed as quickly as possible. See 22 CFR § 171.11(h).

***Please be advised we split this request into two cases, the other F-2024-18956 will be acknowledged by another office.**

This Office will not be able to respond within the 20 days provided by the statute due to “unusual circumstances.” See 5 U.S.C. § 552(a)(6)(B)(i)-(iii). In this instance, the unusual circumstances include the need to search for and collect requested records from other Department offices or Foreign Service posts.

You will not be charged FOIA processing fees.

If you have any questions regarding your request, would like to narrow the scope or arrange an alternative time frame to speed its processing, or would like an estimated date of completion, please contact our FOIA Requester Service Center or our FOIA Public Liaison by email at FOIAstatus@state.gov or telephone at 202-261-8484. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, [8601 Adelphi Road](#)-OGIS, College Park, Maryland 20740-6001, email at ogis@nara.gov ; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

****THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL****



AFL FOIA <foia@aflegal.org>

Ref: F-2024-18956, FOIA Request

1 message

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Wed, Aug 28, 2024 at 4:37 PM

Dear Reed Rubinstein:

Thank you for filing your information access request to the U.S. Department of State. Your request number is F-2024-18956.

You will receive a formal acknowledgement to your request in no later than 10 working days. If the Department requires additional information from you, then you will also be notified.

Should you have any questions about your request, you may also contact us at:

FOIAStatus@state.gov

Regards,
Requesters Communications Branch
Office of Information Programs and Services
U.S. Department of State



AFL FOIA <foia@aflegal.org>

Status Update for Request #F-2024-18956 with DOS

1 message

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Wed, Aug 28, 2024 at 4:37 PM

Dear Reed Rubinstein,

The status of your FOIA request #F-2024-18956 has been updated to the following status 'Received'. To learn more, please log into the DoS FOIA Portal via the Application URL below.

<https://pal.foia.state.gov>

Regards,
DOS



AFL FOIA <foia@aflegal.org>

Ref: F-2024-18956, Freedom of Information Act Acknowledgement

1 message

A_FOIAacknowledgement@groups.state.gov <A_FOIAacknowledgement@groups.state.gov>

Wed, Sep 4, 2024 at
7:28 AM

To: foia@aflegal.org

*THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL.**

Dear Mr. Rubinstein:

This email acknowledges receipt of your August 1, 2024, Freedom of Information Act (FOIA) (5 U.S.C. § 552) request received by the U.S. Department of State, Office of Information Programs and Services on August 1, 2024.

You are seeking a copy of records pertaining to Pro-Hamas Activity in the Watergate complex from July 23, 2024, to the date of process. Unless you advise otherwise, we will treat as non-responsive any compilations of publicly available news reports and any publicly available documents not created by the U.S. government, such as mass-distribution emails from news media. This Office assigned your request the subject reference number and placed it in the complex processing track where it will be processed as quickly as possible. See 22 CFR § 171.11(h).

This Office will not be able to respond within the 20 days provided by the statute due to "unusual circumstances." See 5 U.S.C. § 552(a)(6)(B)(i)-(iii). In this instance, the unusual circumstances include the need to search for and collect requested records from other Department offices or Foreign Service posts.

You will not be charged FOIA processing fees.

If you have any questions regarding your request, would like to narrow the scope or arrange an alternative time frame to speed its processing, or would like an estimated date of completion, please contact our FOIA Requester Service Center or our FOIA Public Liaison by email at FOIAstatus@state.gov or telephone at 202 261 8484. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, [8601 Adelphi Road](#)-OGIS, College Park, Maryland 20740 6001, email at ogis@nara.gov ; telephone at 202 741 5770; toll free at 1 877 684 6448; or facsimile at 202 741 5769.

THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL.

2 attachments



PAL Request Form - 2024-08-28T163319.345.pdf
302K



08.01.2024 State Watergate (2).pdf
115K



AFL FOIA <foia@aflegal.org>

Status Update for Request #F-2024-18956 with DOS

1 message

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Wed, Sep 4, 2024 at 8:46 AM

Dear Reed Rubinstein,

The status of your FOIA request #F-2024-18956 has been updated to the following status 'In Process'. To learn more, please log into the DoS FOIA Portal via the Application URL below.

<https://pal.foia.state.gov>

Regards,
DOS



AFL FOIA <foia@aflegal.org>

Ref: F-2024-19919, Freedom of Information Act Acknowledgement

A_FOIAacknowledgement@groups.state.gov <A_FOIAacknowledgement@groups.state.gov>

Wed, Sep 4, 2024 at
8:30 AM

To: foia@aflegal.org

*THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL.**

Dear Mr. Rubinstein:

This email acknowledges receipt of your August 1, 2024, Freedom of Information Act (FOIA) (5 U.S.C. § 552) request received by the U.S. Department of State, Office of Information Programs and Services on August 1, 2024.

******Please note, this request is a duplicate request from your original request (F-2024-18956) so that it may be processed appropriately.******

You are seeking a copy of records pertaining to Pro-Hamas Activity in the Watergate complex from July 23, 2024, to the date of process. Unless you advise otherwise, we will treat as non-responsive any compilations of publicly available news reports and any publicly available documents not created by the U.S. government, such as mass-distribution emails from news media. This Office assigned your request the subject reference number and placed it in the complex processing track where it will be processed as quickly as possible. See 22 CFR § 171.11(h).

This Office will not be able to respond within the 20 days provided by the statute due to "unusual circumstances." See 5 U.S.C. § 552(a)(6)(B)(i)-(iii). In this instance, the unusual circumstances include the need to search for and collect requested records from other Department offices or Foreign Service posts.

If you have any questions regarding your request, would like to narrow the scope or arrange an alternative time frame to speed its processing, or would like an estimated date of completion, please contact our FOIA Requester Service Center or our FOIA Public Liaison by email at FOIAstatus@state.gov or telephone at 202 261 8484. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, [8601 Adelphi Road](https://www.archives.gov/foia)-OGIS, College Park, Maryland 20740 6001, email at ogis@nara.gov ; telephone at 202 741 5770; toll free at 1 877 684 6448; or facsimile at 202 741 5769.

THIS EMAIL BOX IS NOT MONITORED, PLEASE DO NOT REPLY TO THIS EMAIL.

2 attachments

PAL Request Form - 2024-08-28T163319.345.pdf
302K



08.01.2024 State Watergate (2).pdf
115K



AFL FOIA <foia@aflegal.org>

Ref: F-2024-19919, FOIA Request

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Wed, Sep 4, 2024 at 8:28 AM

Dear Reed Rubinstein:

Thank you for filing your information access request to the U.S. Department of State. Your request number is F-2024-19919.

You will receive a formal acknowledgement to your request in no later than 10 working days. If the Department requires additional information from you, then you will also be notified.

Should you have any questions about your request, you may also contact us at:

FOIAStatus@state.gov

Regards,
Requesters Communications Branch
Office of Information Programs and Services
U.S. Department of State



AFL FOIA <foia@aflegal.org>

Status Update for Request #F-2024-19919 with DOS

foiastatus@state.gov <foiastatus@state.gov>
To: foia@aflegal.org

Wed, Sep 4, 2024 at 8:28 AM

Dear Reed Rubinstein,

The status of your FOIA request #F-2024-19919 has been updated to the following status 'Received'. To learn more, please log into the DoS FOIA Portal via the Application URL below.

<https://pal.foia.state.gov>

Regards,
DOS



August 1, 2024

Via Email: FOIA@usss.dhs.gov

Freedom of Information Act and Privacy Act Branch
245 Murray Lane, SW Building T-5
Washington, DC 20223

Freedom of Information Act Request: Pro-Hamas Activity in the Watergate Complex

Dear FOIA Officer:

America First Legal Foundation (AFL) is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) requests on issues of pressing concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL's X page has over 251,000 followers, and the X page of our Founder and President has over 682,000 followers.

I. Records Requested

- A. All records regarding Prime Minister Netanyahu's USSS security detail at the Watergate Hotel in the District of Columbia on July 24, 2024, including their responsibility—or lack thereof—to secure the hotel conference room where maggots were released.¹
- B. All records regarding the Uniformed Division's protection of the Watergate Hotel in the District of Columbia on July 24, 2024, including their

¹ Maureen Groppe et al., *Maggots at the Watergate, Furious Interns on Capitol Hill*, USA TODAY (July 24, 2024), <https://bit.ly/4dlVAws> ("the Secret Service ... wasn't responsible for securing the hotel conference room where maggots were released, according to the service's Public Safety Joint Information Center").

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Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

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responsibility—or lack thereof—to secure the hotel conference room where maggots were released.²

- C. All records regarding any threat to Prime Minister Netanyahu while he was at the Watergate Hotel.³
- D. All records regarding the decision to host Prime Minister Netanyahu at the Watergate Hotel instead of the Blair House.⁴
- E. Records sufficient to identify all disciplinary actions taken in response to the events at the Watergate Hotel in the District of Columbia on July 24, 2024, including the number of agents disciplined and the type of discipline each received. Only the non-exempt portions of these records are requested, and redactions are acceptable for any personally identifiable information.
- F. All records, including electronic communications, including the words “maggots” or “crickets.”

The time period for this item is July 23, 2024, through the date this request is processed.

II. Processing and Fee Waiver

Processing should strictly comply with the processing guidance in the Attorney General’s Memorandum on Freedom of Information Act Guidelines.⁵ If you have any questions about our request or believe further discussions regarding search and processing would facilitate the more efficient production of requested records, please contact us at FOIA@aflegal.org.

Per 5 U.S.C. § 552(a)(4)(A)(iii) and your agency’s fee waiver regulations, AFL requests a waiver of all search and duplication fees. AFL has a demonstrated ability and intention to effectively convey the information broadly to the public; our status as a representative of the news media has been recognized by other agencies; we have been granted fee waivers by the Departments of State, Defense, Education, Energy, Health and Human Services, Justice, Interior, and Homeland Security. As a non-profit organization, AFL has no commercial interest in this request, which is made entirely to serve the public interest. Finally, disclosure of the information is in the

² *Id.*

³ *Id.* (“Abel Trevino, a spokesperson for the center, told USA TODAY there was never any threat to Netanyahu”).

⁴ *Id.* (“Asked why Israeli Prime Minister Benjamin Netanyahu was not staying there, a White House official, speaking on condition of anonymity, said the ‘visit is not one of the categories that lets it be one of the Blair House uses.’ . . . Shortly after the phone conversation with USA TODAY, the official emailed back to say the Blair House is undergoing long-planned renovations, and is ‘not able to accommodate any guests right now.’”).

⁵ U.S. DEP’T JUST. (Mar. 15, 2022), <https://bit.ly/3zvpxb6>.

public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and of government operations. We are available to provide additional information in writing or offline to support this request. Please contact us immediately if our fee waiver is not granted in full.

III. Conclusion

To accelerate your release of responsive records, AFL welcomes production on an agreed rolling basis. Please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely,

/s/ Reed Rubinstein

America First Legal Foundation



DEPARTMENT OF HOMELAND SECURITY
UNITED STATES SECRET SERVICE
WASHINGTON, D.C. 20223

Freedom of Information Act & Privacy Act Program
Communications Center
245 Murray Lane, SW, Building T-5
Mail Stop 8205
Washington, D.C. 20223

Date: August 2, 2024

Reed Rubinstein
600 14th Street NW, 5th Floor
Washington, DC 20005
foia@aflegal.org

File Number: 20241234

Dear Requester:

This letter acknowledges the receipt of your recent Freedom of Information Act (FOIA) request, received by the United States Secret Service (Secret Service) on August 1, 2024, for:

- 1) All records regarding Prime Minister Netanyahu's USSS security detail at the Watergate Hotel in the District of Columbia on July 24, 2024, including their responsibility—or lack thereof—to secure the hotel conference room where maggots were released
- 2) All records regarding the Uniformed Division's protection of the Watergate Hotel in the District of Columbia on July 24, 2024, including their responsibility—or lack thereof—to secure the hotel conference room where maggots were released
- 3) All records regarding any threat to Prime Minister Netanyahu while he was at the Watergate Hotel
- 4) All records regarding the decision to host Prime Minister Netanyahu at the Watergate Hotel instead of the Blair House
- 5) Records sufficient to identify all disciplinary actions taken in response to the events at the Watergate Hotel in the District of Columbia on July 24, 2024, including the number of agents disciplined and the type of discipline each received. Only the non-exempt portions of these records are requested, and redactions are acceptable for any personally identifiable information.
- 6) All records, including electronic communications, including the words "maggots" or "crickets." The time period for this item is July 23, 2024, through the date this request is processed.

Please be advised, your request for a fee waiver will be held in abeyance pending the quantification of responsive records. The FOIA regulations, Title 6 C.F.R., Chapter I, Part 5 § 5.11(k)(2)(3), set forth six factors to examine when determining whether the applicable legal standard for a fee waiver has been met. We will consider these factors:

- 1) Whether the subject of the requested records concerns "the operations or activities of the government;"

- 2) Whether the disclosure is “likely to contribute” to an understanding of government operations or activities;
- 3) Whether disclosure of the requested information will contribute to the understanding of the public at large, as opposed to the individual understanding of the requestor or a narrow segment of interested persons;
- 4) Whether the contribution of public understanding of government operations or activities will be “significant;”
- 5) Whether the requester has a commercial interest that would be furthered by the requested disclosure; and
- 6) Whether the magnitude of any identified commercial interest to the requestor is sufficiently large in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requestor.

If your fee waiver is denied, we shall charge you for the records in accordance with FOIA regulations as they apply to non-commercial (“all other”) requesters. The first 100 pages of duplication are free of charge. As an “all other” requester, you will be charged .10 cents a page for the duplication of each additional page. As an “all other” requester, the first 2 hours of search time are free of charge, after which you will be charged the per quarter-hour rate (\$4.00, \$7.00, \$10.25) of the searcher.

Furthermore, the submission of your request is viewed as an agreement, by you, to pay duplication and search time costs up to \$25.00. A search for files responsive to your request is being conducted. The appropriate components of the Secret Service are being queried for responsive documents. If any responsive records are located, they will be reviewed for a disclosure determination. You will be contacted before any additional fees are accrued.

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the FOIA regulations, 6 C.F.R., Chapter I, Part 5, Secret Service processes FOIA requests according to their order of receipt. As your request seeks documents that will require a thorough and wide-ranging search, the Secret Service will invoke a 10-day extension for your request, pursuant to 6 C.F.R., Part 5 § 5.5(c). If you would like to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

Your request has been assigned FOIA File No. 20241234. We solicit your cooperation and assure you that the search will be conducted as expeditiously as possible. If you have any questions or would like to check the status of your request, please contact our FOIA Public Liaison Kevin Tyrrell, at (202) 220-1819. Alternatively, you may email this office at FOIA@uss.s.dhs.gov.

Please use the file number indicated above in all future correspondence with this office.

Thank you,

Freedom of Information Act Program
United States Secret Service
245 Murray Lane, SW, Building T-5

Mail Stop 8205
Washington, DC 20223
Phone: (202) 220-1819
Fax: (202) 220-1755
Email: FOIA@USSS.DHS.GOV



August 1, 2024

VIA FOIA Public Access Link (PAL)

Janeen Tyler
United States Park Police
1100 Ohio Drive, SW
Washington, DC 20242

Freedom of Information Act Request: Communications Relating to Pro-Hamas Criminal Activity Outside Union Station

Dear Ms. Tyler:

America First Legal Foundation is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL's X page has over 251,000 followers and the X page of our Founder and President has over 682,000 followers.

I. Records Request

On July 24, 2024, thousands of pro-Hamas demonstrators took to the streets in our nation's Capital to demonstrate their support for terrorists.¹ Many protestors were captured on camera committing Federal crimes by defacing monuments and assaulting law enforcement officers.² Chairman Kenneth Spencer, Chairman of the United States Park Police Fraternal Order of Police issued a statement declaring that his force had "only 29 officers on the ground" who succeeded in arresting 10

¹ Peter Hermann et al., *Charges Dropped Against 11 Anti-Netanyahu Protesters Arrested in D.C.* WASH. POST (July 26, 2024), <https://wapo.st/46u0eWR>.

² See, e.g., 16 U.S.C. § 426i; 18 U.S.C. § 111.

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

individuals “while being assaulted by a mob of thousands.”³ Under 5 U.S.C. § 552(a), AFL requests the following records:

- A. All records and communications mentioning “Palestinian,” “Palestine,” “Jewish Voice for Peace,” “JVP,” “ANSWER Coalition,” “Palestinian Youth Movement,” “PYM,” “People’s Forum,” “Party for Socialism and Liberation,” “PSL,” “International Jewish Anti-Zionist Network,” “IJAN,” “Neturei Karta,” “Let Gaza Live,” “Union Station,” or “Columbus Circle.”
- B. All records or communications relating to preparation, staffing, and resourcing in anticipation of the protests mentioned in Chairman Kenneth Spencer’s statement.⁴
- C. All records or communications with the Department of Interior or the National Park Service requesting additional preparation, staffing, and resourcing in anticipation of the protests mentioned in Chairman Kenneth Spencer’s statement.⁵

The time period for this request is from July 22, 2024, to July 24, 2024.

II. Custodians

- A. Office of the Chief
- B. WASO LE Liaison

III. Fee Waiver

AFL requests a waiver of all search and duplication fees associated with this request under 5 U.S.C. § 552(a)(4)(A)(iii) and 43 C.F.R. § 2.45. First, AFL is a qualified non-commercial public education and news media requester. Our officials routinely appear on national television and use social media platforms to disseminate the information it has obtained about federal government activities. In this case, AFL will make your records and your responses publicly available for the benefit of citizens, scholars, and others, and the public’s understanding of your policies and practices will be enhanced through AFL’s analysis and publication of the requested records. As a nonprofit organization, AFL does not have a commercial purpose, and releasing the requested information is not in AFL’s financial interest. We note that numerous Federal agencies have granted us fee waivers in the past.

³ *PRESS RELEASE: Statement of Kenneth Spencer, Chairman US Park Police Fraternal Order of Police Regarding Columbus Circle Protests*, US PARK POLICE FRATERNAL ORD. OF POLICE (July 25, 2024), <https://bit.ly/4bUsCmp>.

⁴ *Id.*

⁵ *Id.*

IV. Expedited Processing

DOI regulations require the grant of expedited processing for a FOIA request if the requester can demonstrate a “compelling need for the records,” including “(1) [f]ailure to expedite the request could reasonably be expected to pose an imminent threat to the life or physical safety of an individual,” and “(2) an urgency to inform the public about an actual or alleged Federal Government activity and the request is made by a person primarily engaged in disseminating information.” 43 C.F.R. § 2.20(a)(1) and (2).

This request patently qualifies for expedited processing under § 2.20(a)(1) and (2). These demonstrations continue to destroy our great country and monuments to our collective achievements and, filled with support for terrorism and violent criminal acts, they endanger those tasked with protecting these irreplaceable monuments. The public needs immediate assurance that the federal government is adequately preparing, staffing, and resourcing these law enforcement officers. As discussed above, America First Legal is a qualifying news media distributor and has been recognized as such by other Federal agencies.

V. Conclusion

If you have any questions about how to construe this request for records or believe further discussions regarding search and processing would facilitate a more efficient production of records of interest to AFL, please do not hesitate to contact me at FOIA@aflegal.org. Finally, if AFL’s request for a fee waiver is not granted in full, please contact us immediately upon making that determination.

Sincerely,

/s/ Reed Rubinstein

America First Legal Foundation



AFL FOIA <foia@aflegal.org>

Status Update for Request #DOI-NPS-2024-001377

noreply@ains.com <noreply@ains.com>
To: foia@aflegal.org

Wed, Sep 25, 2024 at 9:02 AM

Dear Reed Rubinstein,

The status of your NPS-USPP FOIA request #DOI-NPS-2024-001377 has been updated to the following status 'Received'. To log into the PAL Application click on the Application URL below.

<https://foiaexpresspal.doi.gov>

The message is being sent from an unattended email box. For any future correspondence, please contact the bureau contact at <https://www.doi.gov/foia/contacts>.

Sincerely,

DOI FOIA Office



November 21, 2023

Via FOIA Portal

Mr. Douglas Hibbard, Chief, Initial Request Staff
Office of Information Policy
U.S. Department of Justice
6th Floor, 441 G Street, NW
Washington, DC 20530

Re: Anti-Jewish Hate Crimes

Dear Mr. Hibbard:

America First Legal Foundation (“AFL”) is a national, nonprofit organization. AFL works to promote the rule of law in the United States, prevent executive overreach, ensure due process and equal protection for all Americans, and promote knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL’s X account has over 185,000 followers, and the X account of our Founder and President has over 543,000 followers

I. Background

Hamas’s orgy of rape, murder, and kidnapping in southern Israel on October 7, 2023, was immediately supported on the streets and campuses of the United States by a coordinated campaign of anti-American violence, vandalism, and intimidation. American Jews have lived safely and worshipped freely in the United States for generations. They have served in our military, defended our freedom, and helped build our Nation. Now, they are being subjected to ethnically and religiously motivated attacks with unprecedented frequency and ferocity.

The evidence is that many of the post-October 7 attackers are either persons with origins and citizenship in the Middle East, Pakistan, and North Africa and/or supporters of designated foreign terrorist organizations. Yet, the Department of Justice

611 Pennsylvania Ave SE #231
Washington, DC 20003

320 South Madison Avenue
Monroe, Georgia 30655

www.aflegal.org

has been silent. The contrast between the very public mobilization of the Department's components (including the Federal Bureau of Investigation) and authorities against American parents protesting at school board meetings and its supine response to the illegal and anti-American activities of Hamas's supporters in the United States, and to the targeted harassment of the American Jewish community and supporters of Israel generally, is disturbing. It is difficult to understand how the Biden Administration, which has devoted massive resources to fighting alleged "hate crimes," including the appointment of Saeed Mody as its "Anti-Hate Crimes Resources Coordinator," has found nothing hateful or criminal in pro-Hamas assaults on American citizens and monuments, material support for terrorism, and public calls for genocide.

Therefore, pursuant to the Freedom of Information Act, 5 U.S.C. § 552, AFL requests the following records.

II. Requested Records

All records **excluding news articles and judicial opinions** containing any of the following words or phrases: (1) Israel, (2) Jew, (3) Gaza, (4) Muslim, (5) anti-Semitism, (6) Islamophobia, (7) hate crime, (8) Hamas, (9) CAIR, (10) California, (11) Palestine, (12) Palestinian, (13) Arab, (14) Michigan, (15) alien, or (16) visa. The time frame for this request is October 1, 2023, through the date of processing.

III. Custodians

- A. Saeed Mody
- B. Vanita Gupta
- C. Ben Mizer
- D. Jeremy Maltby
- E. Joshua Revesz
- F. Kristen Clarke

IV. Fee Waiver

Per 5 U.S.C. § 552(a)(4)(A)(iii) and 28 CFR § 16.10, AFL requests a waiver of all search and duplication fees. AFL has a demonstrated ability and intention to effectively convey the information broadly to the public, and it has been granted fee waivers by the Departments of State, Defense, Education, Energy, Health and Human Services, Justice, Interior, and Homeland Security. As a non-profit organization, AFL has no commercial interest in this request, which is made entirely to serve the public

interest. Finally, disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and of government operations. We are, of course, available to provide additional information in writing or offline to support this request. If AFL's request for a fee waiver is not granted in full, please contact us immediately.

Processing should strictly comply with the processing guidance in the Attorney General's Memorandum on Freedom of Information Act Guidelines.¹ If you have any questions about our request or believe further discussions regarding search and processing would facilitate the more efficient production of requested records, please contact me at FOIA@aflegal.org.

V. Conclusion

To accelerate your release of responsive records, AFL welcomes production on an agreed rolling basis. Please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native or PDF format on a USB drive to America First Legal Foundation, 611 Pennsylvania Ave SE #231, Washington, DC 20003.

Thank you in advance for your cooperation.

Sincerely yours,

/s/ Reed D. Rubinstein

Reed D. Rubinstein

America First Legal Foundation

¹ U.S. DEP'T OF JUST. (Mar. 15, 2022), <https://bit.ly/3zvpzb6>.



U.S. Department of Justice
Office of Information Policy
Sixth Floor
441 G Street, NW
Washington, DC 20530-0001

Telephone: (202) 514-3642

November 28, 2023

Reed Rubinstein
America First Legal Foundation
611 Pennsylvania Ave SE
#231
Washington DC 20003
FOIA@aflegal.org

Re: FOIA-2024-00364

Dear Reed Rubinstein:

This is to acknowledge receipt of your Freedom of Information Act (FOIA) request dated November 21, 2023, and received in this Office on November 27, 2023. in which you requested records of various officials of the Office of the Deputy Attorney General and Office of the Associate Attorney General containing specific terms since October 1, 2023.

The records you seek require a search in and/or consultation with another Office, and so your request falls within “unusual circumstances.” See 5 U.S.C. § 552 (a)(6)(B)(i)-(iii) (2018). Because of these unusual circumstances, we need to extend the time limit to respond to your request beyond the ten additional days provided by the statute. For your information, we use multiple tracks to process requests, but within those tracks we work in an agile manner, and the time needed to complete our work on your request will necessarily depend on a variety of factors, including the complexity of our records search, the volume and complexity of any material located, and the order of receipt of your request. At this time we have assigned your request to the complex track. In an effort to speed up our process, you may wish to narrow the scope of your request to limit the number of potentially responsive records so that it can be placed in a different processing track. You can also agree to an alternative time frame for processing, should records be located, or you may wish to await the completion of our records search to discuss either of these options. Any decision with regard to the application of fees will be made only after we determine whether fees will be implicated for this request.

For your information, the Department has a decentralized system for processing FOIA requests and each component of the Department maintains its own records. As such, FOIA requesters need to direct their requests to the Department component they believe have records pertaining to the subjects of their requests. Insomuch as you are also seeking records of the Civil Rights Division (CRT), we have forwarded your request to CRT for processing and direct response to you. Contact information for CRT can be found on www.foia.gov.

We regret the necessity of this delay, but we assure you that your request will be processed as soon as possible. If you have any questions or wish to discuss reformulation or an

-2-

alternative time frame for the processing of your request, you may contact this Office by telephone at the above number, by e-mail at doj.oip.foia@usdoj.gov, or you may write to the Office of Information Policy, United States Department of Justice, Sixth Floor, 441 G Street, NW, Washington, DC 20530-0001. Lastly, you may contact our FOIA Public Liaison, Valeree Villanueva, at the telephone number listed above to discuss any aspect of your request.

Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, Room 2510, 8601 Adelphi Road, College Park, Maryland 20740-6001; e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448.

Sincerely,
Initial Request Staff
Office of Information Policy
U.S. Department of Justice

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.

UNITED STATES DEPARTMENT OF STATE, UN

Defendant

Civil Action No. 24-3117

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
UNITED STATES DEPARTMENT OF STATE,
2201 C St NW
Washington, DC 20451

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William Scolinos
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Ave SE #231
Washington, DC 20003

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 24-3117

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.

UNITED STATES DEPARTMENT OF STATE, UN

Defendant

Civil Action No. 24-3117

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
U.S. SECRET SERVICE,
245 Murray Ln SW, Bldg T-5,
Washington, DC 20223

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William Scolinos
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Ave SE #231
Washington, DC 20003

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 24-3117

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.

UNITED STATES DEPARTMENT OF STATE, UN

Defendant

Civil Action No. 24-3117

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

UNITED STATES DEPARTMENT OF THE INTERIOR
1849 C Street, N.W.
Washington, DC 20240,

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William Scolinos
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Ave SE #231
Washington, DC 20003

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 24-3117

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.

UNITED STATES DEPARTMENT OF STATE, UN

Defendant

Civil Action No. 24-3117

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

c/o Attorney General Merrick Garland
UNITED STATES DEPARTMENT OF JUSTICE
950 Pennsylvania Ave. NW
Washington, DC 20530

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William Scolinos
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Ave SE #231
Washington, DC 20003

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 24-3117

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.

UNITED STATES DEPARTMENT OF STATE, UN

Defendant

)
)
)
)
)
)
)

Civil Action No. 24-3117

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

U.S. Attorney's Office for the District of Columbia
Civil Process Clerk 601 D Street NW
Washington, DC 20530
Email service to: USADC.ServiceCivil@usdoj.gov

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

William Scolinos
AMERICA FIRST LEGAL FOUNDATION
611 Pennsylvania Ave SE #231
Washington, DC 20003

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

ANGELA D. CAESAR, CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 24-3117

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Print

Save As...

Reset

CIVIL COVER SHEET

JS-44 (Rev. 11/2020 DC)

I. (a) PLAINTIFFS AMERICA FIRST LEGAL FOUNDATION (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF <u>11001</u> (EXCEPT IN U.S. PLAINTIFF CASES)		DEFENDANTS UNITED STATES DEPARTMENT OF STATE, UNITED STATES SECRET SERVICE, UNITED STATES DEPARTMENT OF THE INTERIOR, UNITED STATES DEPARTMENT OF JUSTICE COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT <u>11001</u> (IN U.S. PLAINTIFF CASES ONLY) <small>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</small>																									
(c) ATTORNEYS (FIRMNAME, ADDRESS, AND TELEPHONE NUMBER) William Scolinos, Michael Ding, (AMERICA FIRST LEGAL FOUNDATION, 611 Pennsylvania Avenue SE #231, Washington, DC 20003, (301) 965-0179)		ATTORNEYS (IF KNOWN)																									
II. BASIS OF JURISDICTION (PLACE AN x IN ONE BOX ONLY)		III. CITIZENSHIP OF PRINCIPAL PARTIES (PLACE AN x IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) FOR DIVERSITY CASES ONLY!																									
<input type="radio"/> 1 U.S. Government Plaintiff		<input type="radio"/> 3 Federal Question (U.S. Government Not a Party)																									
<input checked="" type="radio"/> 2 U.S. Government Defendant		<input type="radio"/> 4 Diversity (Indicate Citizenship of Parties in item III)																									
		<table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> <th></th> <th style="text-align: center;">PTF</th> <th style="text-align: center;">DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td style="text-align: center;"><input type="radio"/> 1</td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="radio"/> 4</td> <td style="text-align: center;"><input type="radio"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td style="text-align: center;"><input type="radio"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="radio"/> 5</td> <td style="text-align: center;"><input type="radio"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td style="text-align: center;"><input type="radio"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="radio"/> 6</td> <td style="text-align: center;"><input type="radio"/> 6</td> </tr> </tbody> </table>			PTF	DFT		PTF	DFT	Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4	Citizen of Another State	<input type="radio"/> 2	<input type="radio"/> 2	Incorporated and Principal Place of Business in Another State	<input type="radio"/> 5	<input type="radio"/> 5	Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6
	PTF	DFT		PTF	DFT																						
Citizen of this State	<input type="radio"/> 1	<input type="radio"/> 1	Incorporated or Principal Place of Business in This State	<input type="radio"/> 4	<input type="radio"/> 4																						
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Citizen or Subject of a Foreign Country	<input type="radio"/> 3	<input type="radio"/> 3	Foreign Nation	<input type="radio"/> 6	<input type="radio"/> 6																						
IV. CASE ASSIGNMENT AND NATURE OF SUIT (Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)																											
<input checked="" type="radio"/> A. Antitrust <input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> B. Personal Injury/Malpractice <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="checkbox"/> C. Administrative Agency Review <input type="checkbox"/> 151 Medicare Act <u>Social Security</u> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <u>Other Statutes</u> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input type="checkbox"/> D. Temporary Restraining Order/Preliminary Injunction Any nature of suit from any category may be selected for this category of case assignment. *(If Antitrust, then A governs)*																								
<input type="radio"/> E. General Civil (Other) OR <input type="radio"/> F. Pro Se General Civil																											
<u>Real Property</u> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <u>Personal Property</u> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<u>Bankruptcy</u> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <u>Prisoner Petitions</u> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee – Conditions of Confinement <u>Property Rights</u> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent – Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 (DTSA)	<u>Federal Tax Suits</u> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 <u>Forfeiture/Penalty</u> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <u>Other Statutes</u> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 462 Naturalization Application	<input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 485 Telephone Consumer Protection Act (TCPA) <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)																								

<input type="radio"/> G. Habeas Corpus/ 2255 <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input checked="" type="radio"/> I. FOIA/Privacy Act <input checked="" type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> M. Contract <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> N. Three-Judge Court <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify)
 ☐ 6 Multi-district Litigation
 ☐ 7 Appeal to District Judge from Mag. Judge
 ☐ 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)
 Suit to enforce the FOIA, 5 U.S.C. 552

VII. REQUESTED IN COMPLAINT	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ JURY DEMAND:	Check YES only if demanded in complaint YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form

DATE: 11/1/2024	SIGNATURE OF ATTORNEY OF RECORD: /s/ William Scolinos
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INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I.** COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III.** CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV.** CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI.** CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII.** RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.