

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

AMERICA FIRST LEGAL
FOUNDATION,
611 Pennsylvania Ave., SE #231
Washington, D.C. 20003

Plaintiff,

v.

Civil Action No. 1:26-cv-558

SEAN S. CAIRNCROSS, in his official
capacity as National Cyber Director,
1600 Pennsylvania Avenue NW, Wash-
ington, D.C. 20500

and

RUSSELL T. VOUGHT, in his official
capacity as Director of the Office of Man-
agement and Budget,
1600 Pennsylvania Avenue NW, Wash-
ington, D.C. 20500

Defendants.

COMPLAINT

1. Plaintiff America First Legal Foundation (“AFL”) brings this action against the heads of the Office of the National Cyber Director and the Office of Management and Budget 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, Sean S. Cairncross, in his capacity as the U.S. National Cyber Director, is the head of the Office of the National Cyber Director ("ONCD"), an "agency" within the meaning of 5 U.S.C. § 552(f), with its offices located at 1600 Pennsylvania Avenue NW, Washington, D.C. 20500, and has possession and control of the records AFL seeks.

6. Defendant, Russell T. Vought, is Director of the Office of Management and Budget ("OMB"), an "agency" within the meaning of 5 U.S.C. § 552(f), with its

offices located at 1600 Pennsylvania Avenue NW, Washington, D.C. 20500, and has possession and control of the records AFL seeks.

FACTS

7. On December 9, 2025, AFL filed a FOIA request with the Office of the National Cyber Director seeking records related to the Biden Administration’s Misinformation, Disinformation, and Malinformation (“MDM”) policies. Exhibit 1.

8. On the same day, AFL filed a similar FOIA request with the Office of Management and Budget. Exhibit 2.

9. On December 15, 2025, ONCD acknowledged AFL’s FOIA request, assigned it tracking number 26-F-103, and denied AFL’s request for expedited processing. Exhibit 3.

10. As of the date of filing, AFL has received no further communications from ONCD.

11. On December 10, 2025, OMB acknowledged AFL’s FOIA request and assigned it tracking number 2026-238. Exhibit 4.

12. As of the date of filing, AFL has received no further communications from OMB.

CLAIM

Violation of FOIA, 5 U.S.C. § 552

13. AFL repeats and realleges paragraphs 1–12.

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

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

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

17. Additionally, in each instance, AFL sufficiently demonstrated that expedited processing was appropriate by citing the widespread media interest in these issues.

18. Yet, the Defendants failed to comply with the FOIA and their own regulations by denying AFL's requests for expedited processing.

19. Accordingly, the Defendants have violated the FOIA.

PRAYER FOR RELIEF

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;

iv. Award AFL attorney's fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E);
and

v. Grant AFL such other and further relief as this Court deems proper.

February 19, 2026

Respectfully submitted,

/s/ Robert A. Crossin

Robert A. Crossin (DC Bar #90036740)

Trey Donathan (NC Bar #63878)*

AMERICA FIRST LEGAL FOUNDATION

611 Pennsylvania Ave SE #231

Washington, DC 20003

Tel.: 202.596.9846

bobby.crossin@aflegal.org

trey.donathan@aflegal.org

* Motion *pro hac vice* forthcoming

Counsel for Plaintiff



December 9, 2025

VIA Email: FOIA@ncd.eop.gov

Office of the National Cyber Director
James Halpert, Esq.
FOIA Officer
725 17th Street NW,
Suite 427
Washington, DC 20006

**Freedom of Information Act Request: NGO and European Commission
Coordination on Misinformation, Disinformation, and Malinformation**

Dear James Halpert:

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. 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.

I. Records Request

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, AFL hereby requests:

1. All records, including communications, mentioning the organizations listed below that include any of the terms “misinformation,” “disinformation,” “malinformation,” “MDM,” or “breaking containment.” This includes, but is not limited to all records including or sent to/from the email domains listed below:
 - a. European Commission (@ec.europa.eu)
 - b. Council on Foreign Relations (@cfr.org)
 - c. Integrity Institute (@integrityinstitute.org)
 - d. EU DisinfoLab (@disinfo.eu)
 - e. Atlantic Council/Digital Forensic Research Lab (“Atlantic Council,” “DFRLab”) (@atlanticcouncil.org)
 - f. Avaaz (@avaaz.org)

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- g. Counter Extremism Project (@counterextremism.com)
 - h. Dangerous Speech Project (@dangerousspeech.org)
 - i. The American Sunlight Project (@americansunlight.org)
 - j. European Digital Media Observatory (“EDMO”) (edmo@eui.eu)
 - k. Center for Countering Digital Hate (“CCDH”) (@counterhate.com)
 - l. Southern Poverty Law Center (“SPLC”) (@splcenter.org)
2. All communications with any of the groups mentioned in Part 1 of this request relating to the suppression of speech, including but not limited to records relating to content moderation, suppression of narratives, or the regulation (including fines or penalties) for social media sites like Twitter/X.
 3. All communications between the Office of the National Cyber Director with any of the groups mentioned in Part 1 of this request.
 4. All records and communications between the Office of the National Cyber Director and either the groups listed in Part 1 or with representatives of the European Commission relating to the European Commission’s financial penalties levied against “X,” or “X Corp,” between October 28, 2022, and January 20, 2025.

The time period for Parts 1–3 of this request is from January 20, 2021, through January 20, 2025.

II. Custodians

All officials at the GS-14 level and above (or equivalent) within the Office of the National Cyber Director.

III. Fee Waiver

Per 5 U.S.C. § 552(a)(4)(A)(iii), AFL requests a waiver of all search and duplication fees associated with this request. AFL is a qualified non-commercial public education and news media requester. AFL has already demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website. For example, its 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 the records and the agency’s responses publicly available for the benefit of citizens, scholars, and others. AFL’s analysis and publication of the requested records will enhance the public’s understanding of the agency’s policies and practices. As a nonprofit organization, AFL does not have a commercial purpose, and the release of the information requested is not in AFL’s financial interest. AFL has been granted fee waivers by agencies across the Federal government, including the Departments

of State, Justice, Education, Energy, Interior, and Homeland Security.

IV. Expedited Processing

AFL requests expedited processing of this request. In support thereof, AFL certifies its compelling need for expedited processing under 5 U.S.C. § 552(a)(6)(E). AFL is a qualifying organization primarily engaged in disseminating information, and there is an urgency to inform the public about an actual or alleged Federal Government activity. Furthermore, there exist questions about this matter of widespread and exceptional public interest about the Government's integrity which affect public confidence

This request seeks records that will shed light on the role of the United States government in the development or encouragement of policies to suppress or moderate speech across jurisdictions, including any communications or coordination with foreign regulators concerning enforcement actions directed at X.¹ Given ongoing, high-profile enforcement activity overseas and continuing public debate in the United States about government involvement in content moderation, prompt disclosure is necessary to inform Americans of their own government's role in major actions affecting their ability to exercise their freedom of speech.

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 us 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/ Will Scolinos

America First Legal Foundation

¹ *Commission Fines X €120 Million Under the Digital Services Act*, EUR. COMM'N (Dec 4, 2025), <https://perma.cc/8EVQ-DGFS>.



December 9, 2025

VIA Email: OMBFOIA@omb.eop.gov

Office of Management and Budget
Michele Holt
FOIA Public Liaison
725 17th Street NW,
Suite 9272
Washington, DC 20503

**Freedom of Information Act Request: NGO and European Commission
Coordination on Misinformation, Disinformation, and Malinformation**

Dear Ms. Holt:

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. 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.

I. Records Request

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, AFL hereby requests:

1. All records, including communications, mentioning the organizations listed below that include any of the terms “misinformation,” “disinformation,” “malinformation,” “MDM,” or “breaking containment.” This includes, but is not limited to all records including or sent to/from the email domains listed below:
 - a. European Commission (@ec.europa.eu)
 - b. Council on Foreign Relations (@cfr.org)
 - c. Integrity Institute (@integrityinstitute.org)
 - d. EU DisinfoLab (@disinfo.eu)
 - e. Atlantic Council/Digital Forensic Research Lab (“Atlantic Council,” “DFRLab”) (@atlanticcouncil.org)
 - f. Avaaz (@avaaz.org)

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- g. Counter Extremism Project (@counterextremism.com)
 - h. Dangerous Speech Project (@dangerousspeech.org)
 - i. The American Sunlight Project (@americansunlight.org)
 - j. European Digital Media Observatory (“EDMO”) (edmo@eui.eu)
 - k. Center for Countering Digital Hate (“CCDH”) (@counterhate.com)
 - l. Southern Poverty Law Center (“SPLC”) (@splcenter.org)
2. All communications with any of the groups mentioned in Part 1 of this request relating to the suppression of speech, including but not limited to records relating to content moderation, suppression of narratives, or the regulation (including fines or penalties) for social media sites like Twitter/X.
 3. All communications between OMB and any of the groups mentioned in Part 1 of this request.
 4. All records and communications between OMB and either the groups listed in Part 1 or with representatives of the European Commission relating to the European Commission’s financial penalties levied against “X,” or “X Corp,” between October 28, 2022, and January 20, 2025.

The time period for Parts 1–3 of this request is from January 20, 2021, through January 20, 2025.

II. Custodians

All officials at the GS-14 level and above (or equivalent) within:

1. Office of the Director
2. National Security Programs
3. Office of Information and Regulatory Affairs
4. Office of E-Government and Information Technology

III. Fee Waiver

Per 5 U.S.C. § 552(a)(4)(A)(iii) and 5 C.F.R. § 1303.94, AFL requests a waiver of all search and duplication fees associated with this request. AFL is a qualified non-commercial public education and news media requester. AFL has already demonstrated its commitment to the public disclosure of documents and creation of editorial content through regular substantive analyses posted to its website. For example, its 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 the records and the agency’s responses publicly available for the benefit of citizens, scholars, and others. AFL’s analysis and publication of the requested records will enhance the public’s understanding of the agency’s policies and practices. As a nonprofit organization, AFL does not have a

commercial purpose, and the release of the information requested is not in AFL's financial interest. AFL has been granted fee waivers by agencies across the Federal government, including the Departments of State, Justice, Education, Energy, Interior, and Homeland Security.

IV. Expedited Processing

AFL requests expedited processing of this request. In support thereof, AFL certifies its compelling need for expedited processing under 5 U.S.C. § 552(a)(6)(E) and 5 C.F.R. § 1303.40(e). There is "an urgency to inform the public about an actual or alleged Federal Government activity." 5 C.F.R. § 1303.40(e). Furthermore, the extent to which United States government was involved in actions to flag disfavored speech or undermining major social media companies, meaning that "[t]here are possible questions, in a matter of widespread and exceptional public interest, about the Government's integrity which affect public confidence." 5 C.F.R. § 1303.40(e)(iv).

This request seeks records that will shed light on the role of the United States government in the development or encouragement of policies to suppress or moderate speech across jurisdictions, including any communications or coordination with foreign regulators concerning enforcement actions directed at X.¹ Given ongoing, high-profile enforcement activity overseas and continuing public debate in the United States about government involvement in content moderation, prompt disclosure is necessary to inform Americans of their own government's role in major actions affecting their ability to exercise their freedom of speech.

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 us 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/ Will Scolinos

America First Legal Foundation

¹ *Commission Fines X €120 Million Under the Digital Services Act*, EUR. COMM'N (Dec 4, 2025), <https://perma.cc/8EVQ-DGFS>.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF THE NATIONAL CYBER DIRECTOR
WASHINGTON, D.C. 20503

December 15, 2025

Dear America First Legal Foundation,

The Office of the National Cyber Director (ONCD) acknowledges receipt of your Freedom of Information Act (FOIA) request, received on December 9, 2025, and assigned tracking number 26-F-0103. For your reference, your FOIA request is attached. We will be responding to your FOIA request in more than 20 days due to limited resources to search, locate, and review the records you seek.

Your request seeks the following information:

“All records, including communications, mentioning the organizations listed below that include any of the terms “misinformation,” “disinformation,” “malinformation,” “MDM,” or “breaking containment.” This includes, but is not limited to all records including or sent to/from the email domains listed below:

- a. European Commission (@ec.europa.eu)
- b. Council on Foreign Relations (@cfr.org)
- c. Integrity Institute (@integrityinstitute.org)
- d. EU DisinfoLab (@disinfo.eu)
- e. Atlantic Council/Digital Forensic Research Lab (“Atlantic Council,” “DFRLab”) (@atlanticcouncil.org)
- f. Avaaz (@avaaz.org)
- g. Counter Extremism Project (@counterextremism.com)
- h. Dangerous Speech Project (@dangerousspeech.org)
- i. The American Sunlight Project (@americansunlight.org)
- j. European Digital Media Observatory (“EDMO”) (edmo@eui.eu)
- k. Center for Countering Digital Hate (“CCDH”) (@counterhate.com)
- l. Southern Poverty Law Center (“SPLC”) (@splcenter.org”

Should you have any questions or wish to discuss any aspect of your request you may contact our FOIA Officer at FOIA@ncd.eop.gov or the mailing address below.

You have the right to administratively appeal by writing to ONCD at the address provided below. Your appeal must be postmarked or electronically transmitted within 90 days of the date of this response. 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: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

FOIA Officer
The Office of the National Cyber Director
725 17th Street N.W.,
Washington, DC 20006



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF THE NATIONAL CYBER DIRECTOR
WASHINGTON, D.C. 20503

Kind Regards,
The ONCD FOIA Team



AFL FOIA <foia@aflegal.org>

2026-238 RE: [EXTERNAL] FOIA Request

MBX OMB FOIA <MBX.OMB.FOIA@omb.eop.gov>
To: AFL FOIA <foia@aflegal.org>

Wed, Dec 10, 2025 at 12:53 PM

Hello,

This email acknowledges receipt of your Freedom of Information Act (FOIA) request to the Office of Management and Budget (OMB) received in this office on December 9, 2025. Your request has been logged in and is being processed. For your reference, the OMB FOIA number is 2026-238..

Thank you,

OMB's FOIA Office

From: AFL FOIA <foia@aflegal.org>
Sent: Tuesday, December 9, 2025 10:15 PM
To: MBX OMB FOIA <MBX.OMB.FOIA@OMB.eop.gov>
Subject: [EXTERNAL] FOIA Request

Good evening,

Please read the attached FOIA request.

Best,

America First Legal Foundation

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

CLEAR FORM

AMERICA FIRST LEGAL FOUNDATION

Plaintiff

v.
SEAN S. CAIRNCROSS, in his official capacity; and
RUSSELL T. VOUGHT, in his official capacity

Defendant

Civil Action No. 1:26-cv-558

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
Sean S. Cairncross
National Cyber Director
1600 Pennsylvania Ave NW
Washington, DC 20500

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:

Robert A. Crossin, Esq.
611 Pennsylvania Ave SE #231
Washington, D.C. 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. _____

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.
SEAN S. CAIRNCROSS, in his official capacity; and
RUSSELL T. VOUGHT, in his official capacity

Defendant

Civil Action No. 1:26-cv-558

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* — RUSSELL T. VOUGHT
1600 Pennsylvania Ave NW
Washington, DC 20500

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:

Robert A. Crossin, Esq.
611 Pennsylvania Ave SE #231
Washington, D.C. 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. 1:26-cv-558

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.
SEAN S. CAIRNCROSS, in his official capacity; and
RUSSELL T. VOUGHT, in his official capacity

Defendant

Civil Action No. 1:26-cv-558

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*
Attorney General Pamela Bondi
U.S. Department of Justice
950 Pennsylvania Avenue 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:

Robert A. Crossin, Esq.
611 Pennsylvania Ave SE #231
Washington, D.C. 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. 1:26-cv-558

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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

SEAN S. CAIRNCROSS, in his official capacity; and
RUSSELL T. VOUGHT, in his official capacity

Defendant

Civil Action No. 1:26-cv-558

SUMMONS IN A CIVIL ACTION

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

U.S. Attorney for the District of Columbia
Attn: 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:

Robert A. Crossin, Esq.
611 Pennsylvania Ave SE #231
Washington, D.C. 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. 1:26-cv-558

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_____ 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

<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.)
 Violation of 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: YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
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VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form
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DATE: Feb. 19, 2026	SIGNATURE OF ATTORNEY OF RECORD:
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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.