

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

CAMPAIGN LEGAL CENTER,
1101 14th Street NW, Suite 400
Washington, DC 20005,

Plaintiff,

v.

UNITED STATES OFFICE OF
GOVERNMENT ETHICS,
250 E Street SW, Suite 750
Washington, DC 20024,

Defendant.

Civil Action No. 26-1312

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1. Plaintiff Campaign Legal Center (CLC or Plaintiff) brings this action under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, to compel Defendant United States Office of Government Ethics (OGE) to produce records responsive to a FOIA request seeking records relating to the “Department of Government Efficiency” (DOGE).

JURISDICTION AND VENUE

2. This Court has jurisdiction under 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331. Venue is proper under 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391(e).

PARTIES

3. Plaintiff Campaign Legal Center is a nonpartisan, nonprofit legal organization that works to strengthen American democracy at all levels of government. Among other activities, CLC engages in local, state, and federal actions to ensure the political process is accessible to all citizens, resulting in a representative, responsive, and accountable government. As part of these activities, CLC conducts research, publishes reports and articles, submits regulatory comments, and provides expert analysis to the media. CLC is also involved in litigation throughout the country

regarding voting rights, campaign finance, redistricting, and electoral ethics. To support these efforts and to educate the public, CLC regularly seeks information under FOIA regarding federal agency decision-making.

4. Defendant OGE is an agency of the United States headquartered in Washington, DC. OGE has possession and control of the records that CLC seeks.

STATEMENT OF FACTS

5. On June 26, 2025, CLC submitted a FOIA request to OGE, seeking certain records relating to DOGE. Specifically, CLC requested the following records created by, received by, or in OGE's possession between November 5, 2024, and the date of the search:

1. Any and all requests, communications, and/or correspondence sent or received by your office or agency regarding financial disclosure reports or conflicts of interest with regard to employees of the "Department of Government Efficiency," "DOGE," or "DOGE Teams" to any office or agency within the federal government.
2. Any guidance documents, or similar records, not otherwise made publicly available, relating to the "Department of Government Efficiency," "DOGE," or the U.S. DOGE Service Temporary Organization, or provided to employees of DOGE.
3. Any and all other records pertaining to the "Department of Government Efficiency," "DOGE," or the U.S. DOGE Service Temporary Organization.
4. Any and all communications between any employee or employees of your office or agency and any DOGE employees.
5. Any and all communications between employees of your office or agency and individuals affiliated or associated with the "Department of Government Efficiency," "DOGE," or the U.S. DOGE Service Temporary Organization, and
6. Any and all communications between employees of your office or agency and individuals with an email address ending in spacex.com or tesla.com.

6. In its request, CLC sought a waiver of or a reduction in fees and explained in support that disclosure of the requested information would contribute significantly to public

understanding of the operations or activities of government. CLC also argued that it qualified for a fee waiver as a representative of the news media.

7. CLC requested expedited processing of its FOIA request pursuant to OGE's rules, 5 C.F.R. § 2604.301(e).

8. OGE acknowledged receipt of CLC's request by email on July 15, 2025, and by letter dated July 21, 2025.

9. In the July 21 letter, OGE denied CLC's request for expedited processing. OGE also stated in the letter that it estimated a completion date of September 12, 2025.

10. On August 20, 2025, representatives of OGE and CLC met via teleconference to discuss processing of CLC's FOIA request.

11. On August 22, 2025, CLC emailed OGE with the names of 107 individuals putatively associated with DOGE and agreed that its first, fourth, and fifth requests for records could be limited to records relating to those 107 individuals. Through email exchanges on September 2, CLC also agreed to combine requests four and five. As a result of these changes, CLC's updated FOIA request was as follows:

1. Any communications about financial disclosure reports or conflicts of interest concerning any of the 107 listed individuals.
2. Any guidance documents, or similar records, not otherwise made publicly available, relating to the "Department of Government Efficiency," "DOGE," or the U.S. DOGE Service Temporary Organization, or provided to employees of DOGE.
3. Any and all communications of OGE leadership, general counsel or senior decision makers regarding ethics responsibilities of DOGE employees.
4. Any and all communications between DOGE employees (individuals using the doqe.eop.gov domain or any of the 107 listed individuals and OGE leadership, general counsel, senior decision makers, or employees tasked with communicating with DOGE/Department of Government Efficiency/U.S. DOGE Service Temporary Organization.

5. Any and all communications between employees of your office or agency and individuals with an email address ending in spacex.com or tesla.com.

12. On October 1, 2025, CLC emailed OGE seeking an estimate of the completion date for CLC's FOIA request.

13. On November 13, 2025, OGE emailed CLC indicating that its search had located more than 1,400 items and estimating that it would take more than 500 days to complete processing.

14. On November 24, 2025, representatives of OGE and CLC met via teleconference to discuss the processing of CLC's FOIA request.

15. Through email exchanges between CLC and OGE on November 25, 2025, CLC further agreed to modify its FOIA request as follows:

1. Any communications about financial disclosure reports or conflicts of interest concerning any of the following 10 individuals:

Donald Park
Edward Coristine
Scott Langmack
Joe Gebbia
Kathryn Armstrong Loving
Joanna Wischer
Thomas Shedd
Jeremy Lewin
Zachary Terrell
Stephen Ehikian

2. Any and all communications between individuals using the doge.eop.gov domain and OGE leadership, general counsel, senior decision makers, or employees tasked with communicating with DOGE/Department of Government Efficiency/U.S. DOGE Service Temporary Organization regarding ethics responsibilities for DOGE employees.

3. Any and all communications between employees of your office or agency and individuals with an email address ending in spacex.com or tesla.com.

16. On December 16, 2025, CLC emailed OGE seeking an estimated date of completion of its FOIA request.

17. The following day, OGE responded that its current average processing time was 116.7 days.

18. On February 11, 2026, CLC emailed OGE seeking an update on the processing of its FOIA request.

19. On February 13, 2026, OGE responded that it was working on the first rolling production, but that there were multiple layers of consultation required to complete processing of the request, including with the White House and the Office of Personnel Management (OPM).

20. On March 9, 2026, CLC again requested a status update from OGE.

21. That same day, OGE responded that it was continuing to work on the first rolling production. OGE also reiterated that it was consulting with the White House and that its ability to release the records was subject to receiving the White House's feedback.

22. OGE has not made a final determination or production of records in response to CLC's FOIA request. Indeed, OGE has not released any records in response to CLC's request.

23. More than 20 business days have passed since CLC submitted its FOIA request.

CLAIM FOR RELIEF

24. CLC has a right under FOIA, 5 U.S.C. § 552, to the records responsive to its FOIA request and to a public-interest fee waiver.

25. OGE's failure to disclose the requested records has no legal basis.

PRAYER FOR RELIEF

WHEREFORE, CLC requests that this Court:

A. Declare that OGE's failure to provide the records responsive to CLC's FOIA request is unlawful;

B. Order OGE to make the requested records available to CLC at no cost and without delay;

C. Award CLC its costs and reasonable attorneys' fees pursuant to 5 U.S.C. § 552(a)(4)(E); and

D. Grant such other relief as this Court may deem just and proper.

Dated: April 16, 2026

Respectfully submitted,

/s/ Nandan M. Joshi
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