

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

PUBLIC CITIZEN,
1600 20th Street NW
Washington, DC 20009,

Plaintiff,

v.

Civil Action No. 26-3662

NATIONAL PARK SERVICE,
1849 C Street NW
Washington, DC 20240,

and

U.S. DEPARTMENT OF
THE INTERIOR,
1849 C Street NW
Washington, DC 20240,

Defendants.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1. Plaintiff Public Citizen brings this action under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, to compel defendants National Park Service and Department of the Interior to produce records responsive to a FOIA request that Public Citizen submitted for communications between the National Park Service and the Trust for the National Mall concerning the Trust's acceptance and management of private donations to fund the White House ballroom.

JURISDICTION AND VENUE

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

PARTIES

3. Plaintiff Public Citizen is a nonprofit organization based in Washington, DC. Public Citizen submitted the FOIA request at issue in this action.

4. Defendant National Park Service (NPS) is a bureau of the Department of the Interior. NPS has possession of and control over the records that Public Citizen seeks.

5. Defendant Department of the Interior is an agency of the United States. Department of the Interior has possession of and control over the records that Public Citizen seeks.

BACKGROUND

6. On May 6, 2026, Public Citizen submitted a FOIA request to NPS through the Public Access Link on the website of the Department of the Interior for “[a]ll e-mail communications between the dates 8/1/2025 and 5/5/2026 that were sent from, sent to, or copied to National Park Service Liaison to the White House JOHN STANWICH at the e-mail address John_Stanwich@nps.gov that were sent from, sent to, or copied to any of the following”: (1) “CINDY WILLMANN at the Trust for the National Mall”; (2) “LAURA SILDON at the Trust for the National Mall”; (3) “CATHERINE TOWNSEND at the Trust for the National Mall”; (4) “[a]ny email address that includes the following domain name: nationalmall.org.”

7. In its FOIA request, Public Citizen sought a full waiver of fees because disclosure of the requested record would be in the public interest and not for commercial use.

8. By email on May 6, 2026, the Department of Interior acknowledged receipt of Public Citizen’s FOIA request to NPS and assigned it control number DOI-2026-006050.

9. By email on May 13, 2026, NPS emailed Public Citizen to request that Public Citizen “specify a subject matter or search term(s) for th[e] emails” that Public Citizen requested. In addition, by email, the Department of Interior FOIA Office stated that “[t]he status of your NPS

FOIA request #DOI-2026-006050 has been updated to the following status ‘On Hold – Need Info/Clarification.’”

10. By email on May 20, 2026, Public Citizen responded to NPS and specified “the following subject matter or search term(s) for the requested email records: Emails that include the following three search terms: ‘East Wing Modernization and State Ballroom Project’; ‘East Wing’; ‘Donation Review.’” NPS replied by email on May 28, 2026, stating that the clarification “helps.”

11. On August 31, 2026, Public Citizen checked the status of the request through the Department of the Interior’s Public Access Link. The information provided by the Public Access Link stated August 28, 2026, as the “estimated delivery date” for NPS’s response to Public Citizen’s request.

12. By email on September 18, 2026, Public Citizen emailed NPS, stating that the estimated delivery date had passed and requesting that NPS provide a revised estimated date of completion and estimated date for producing the requested records. Public Citizen did not receive a response.

13. By email on October 2, 2026, Public Citizen again emailed NPS to request an estimated date of completion for the request. Public Citizen again did not receive a response.

14. By email on October 9, 2026, Public Citizen again emailed NPS to request that NPS respond with a production of the requested records or an estimated date of completion for the request. Public Citizen did not receive a response.

15. More than 20 business days have passed since Public Citizen submitted its May 6, 2026, FOIA request, and Public Citizen has not received from NPS a determination concerning its request or any records in response to the request.

CAUSE OF ACTION

16. Public Citizen has a right under FOIA, 5 U.S.C. § 552, to the records requested in its FOIA request and to a fee waiver, and Defendants' failure to disclose the requested records has no legal basis.

PRAYER FOR RELIEF

WHEREFORE, Public Citizen requests that this Court:

A. Declare that Defendants' failure to provide the records responsive to Public Citizen's FOIA request is unlawful;

B. Order Defendants to make the requested records available to Public Citizen at no cost and without delay;

C. Award Public Citizen 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: October 20, 2026

Respectfully submitted,

/s/ Wendy Liu

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