



## BACKGROUND

6. On February 25, 2026, Public Citizen submitted a FOIA request to the FBI for records related to Director Patel's trip to Milan, Italy, for the 2026 Winter Olympics. Specifically, Public Citizen requested copies of the following records:

- (1) The travel authorization form(s) and any accompanying written justification submitted in connection with FBI Director Kashyap "Kash" Patel's trip to Milan, Italy, on or about February 19–23, 2026.
- (2) Flight logs and passenger manifests for FBI or Department of Justice aircraft (including the FBI Gulfstream G550) used in connection with Director Patel's travel to and from Italy on or about February 19–23, 2026.
- (3) Director Patel's official itinerary or schedule for the Milan trip, including any amendments or revisions.
- (4) Records reflecting the total cost to the U.S. government of Director Patel's Milan trip, including aircraft operating costs, fuel, crew expenses, per diem, lodging, and ground transportation.
- (5) Records reflecting any reimbursement made or owed by Director Patel to the U.S. government for personal portions of the trip, including the methodology used to calculate such reimbursement.
- (6) Emails and memoranda sent to or from the FBI Director's Office between January 1, 2026, and the date of this request concerning the planning, scheduling, or purpose of Director Patel's trip to Milan, including any communications with the U.S. Embassy in Rome, the U.S. Consulate in Milan, or the office of U.S. Ambassador to Italy Tilman Fertitta.
- (7) Tickets, credentials, passes, or invitations obtained for Director Patel to attend 2026 Winter Olympics events, including men's ice hockey games, and records showing how such access was arranged and who paid for it.
- (8) Briefing materials, agendas, and readouts from Director Patel's meetings in Milan with Italian law enforcement officials, staff at the Milan Joint Operations Center, and U.S. Ambassador Fertitta.
- (9) Any ethics opinions, conflict-of-interest reviews, or official/personal travel determinations prepared in connection with Director Patel's Milan trip.

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

8. On March 3, 2026, the FBI acknowledged receipt of Public Citizen's FOIA request and assigned it FOIPA Request No. 1723924-000.

9. In addition, by letter, on March 3, 2026, the FBI stated that "unusual circumstances" applied to the processing of Public Citizen's FOIA request, and that it would not make a determination on the request within 20 working days.

10. On May 1, 2026, Public Citizen emailed the FBI requesting an update on the request and an estimated date of completion.

11. The FBI responded by email on May 4, 2026, stating that Public Citizen's request was in "Initial Processing" and that "the estimated date on which the FBI will complete action on your request is 2,010 days from the date the FBI opened your request."

12. On May 7, 2026, Public Citizen emailed the FBI to request prioritization of certain parts of the request and a rolling production of responsive records.

13. The FBI responded by email on May 8, 2026, stating that it had forwarded Public Citizen's May 7 email to a FOIA analyst for review and determination.

14. On May 13, 2026, Public Citizen emailed the FBI to request an update on the status of the request.

15. The FBI responded by email on May 14, 2026, stating that "the estimated date on which the FBI will complete action on your request is 2,010 days from the date the FBI opened your request."

16. By email on May 26, 2026, Public Citizen asked the FBI for an update of the status of the request. The next day, the FBI responded, stating that it was still processing the request.

17. By email on May 27, 2026, Public Citizen asked the FBI for additional information about the processing of its request, including the number of pages of potentially responsive records and the estimated timeline for the FBI's search and response. That same day, the FBI responded, stating that "the estimated date on which the FBI will complete action on your request is 2,010 days from the date the FBI opened your request."

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

### **CAUSE OF ACTION**

19. 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.

20. Defendant's failure to disclose the requested records has no legal basis.

### **PRAYER FOR RELIEF**

WHEREFORE, Public Citizen requests that this Court:

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

B. Order the FBI 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: June 3, 2026

Respectfully submitted,

/s/ William H. Gomberg

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