

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

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PUBLIC CITIZEN,		)
1600 20th Street NW		)
Washington, DC 20009,		)
		)
Plaintiff,		)
		)
v.	Civil Action No. 25-4468	)
		)
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.		)
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**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 Public Citizen submitted for the contract to construct a ballroom on White House grounds.

**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 October 22, 2025, Public Citizen submitted a FOIA request to NPS through the Public Access Link on the website of the Department of the Interior for the “[c]ontract between the National Park Service, the Trust for the National Mall, and the White House regarding the White House Ballroom project.” The date range for the record search was between January 20, 2025, and October 21, 2025.

7. Public Citizen sought expedited processing of its FOIA request. In support, it explained that “Public Citizen needs this document to inform the public about the White House East Wing demolition underway now (10/22/25) so that the public may better understand how this project is being managed.”

8. 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.

9. By email on October 22, 2025, NPS acknowledged receipt of Public Citizen’s FOIA request and assigned it control number DOI-2026-000596.

10. On November 14, 2025, Public Citizen emailed NPS to request an estimated date of completion for its request. Public Citizen did not receive a response.

11. On November 20, 2025, Public Citizen emailed NPS and requested that NPS respond to the request or provide an estimated date of completion. Public Citizen did not receive a response.

12. On November 24, 2025, 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 November 20, 2025, as the "estimated delivery date" for responding to Public Citizen's request.

13. On November 24, 2025, Public Citizen emailed NPS, stating that the estimated delivery date had passed and requesting that NPS respond to the request or provide a revised estimated date of completion and reason for the delay. Public Citizen did not receive a response.

14. On December 1, 2025, Public Citizen left a message on the voicemail of NPS's FOIA office. NPS did not respond to the message.

15. That same day, Public Citizen emailed the Department of the Interior's FOIA Public Liaison to request that NPS respond to the request. The Public Liaison acknowledged receipt of the email but did not provide a substantive response.

16. On December 8, 2025, Public Citizen again emailed the Public Liaison. Public Citizen did not receive a response.

17. More than 20 business days have passed since Public Citizen submitted its FOIA request on October 22, 2025, and Public Citizen has not received from NPS a determination concerning its request or any records in response to the request.

### **CAUSE OF ACTION**

18. 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: December 22, 2025

Respectfully submitted,

*/s/ Wendy Liu*

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\*application for admission to D.D.C. pending

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