

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

CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No. 25-cv-3670-TJK

**NOTICE OF VOLUNTARY DISMISSAL OF COUNTS ONE THROUGH FIVE OF
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff hereby gives notice of its voluntary dismissal of Counts One through Five of its Complaint. Because this notice effectuates the dismissal of all claims against Defendants National Archives and Records Administration and Marco Rubio, they should be terminated as parties in the case.

Date: January 25, 2026

Respectfully Submitted,

/s/ Nikhel S. Sus

Nikhel S. Sus (D.C. Bar No. 1017937)
Kayvan Farchadi (D.C. Bar No. 1672753)
Citizens for Responsibility and Ethics
in Washington
P.O. Box 14596
Washington, DC 20044
Phone: (202) 408-5565
Fax: (202) 508-5020
nsus@citizensforethics.org
kfarchadi@citizensforethics.org

Counsel for Plaintiff