IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JASON LEOPOLD,

BLOOMBERG L.P.,
731 Lexington Ave
New York, NY 10022

Plaintiffs,

v.

FEDERAL BUREAU OF INVESTIGATION,
935 Pennsylvania Ave. NW
Washington, D.C. 20535

U.S. DEPARTMENT OF JUSTICE,
950 Pennsylvania Ave. NW
Washington, D.C. 20530

Defendants.

COMPLAINT

1. Plaintiffs JASON LEOPOLD and BLOOMBERG L.P. bring this suit to compel Defendants FEDERAL BUREAU OF INVESTIGATION and U.S. DEPARTMENT OF JUSTICE to discharge their obligations under the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), including by conducting a reasonable search, issuing a determination, and producing emails from Justice Department officials and other records regarding Jeffrey Epstein and the Epstein Transparency Act.

PARTIES

2. Plaintiff JASON LEOPOLD is an investigative reporter at Bloomberg News and is one of the FOIA requesters in this case.

3. Plaintiff BLOOMBERG L.P. is the owner and operator of Bloomberg News. Bloomberg's newsroom of more than 2,700 journalists and analysts delivers thousands of stories a day, producing content that is featured across multiple platforms, including digital, TV, radio, streaming video, print, and live events. BLOOMBERG L.P. is one of the FOIA requesters in this case.

4. Defendant FEDERAL BUREAU OF INVESTIGATION ("FBI") is a federal agency and is subject to the Freedom of Information Act, 5 U.S.C. § 552.

5. Defendant U.S. DEPARTMENT OF JUSTICE ("DOJ") is a federal agency and is subject to the Freedom of Information Act, 5 U.S.C. § 552.

JURISDICTION AND VENUE

6. This case is brought under 5 U.S.C. § 552(a)(4)(B) and presents a federal question conferring jurisdiction on this Court. *See* 28 U.S.C. § 1331.

7. Venue is proper under 5 U.S.C. § 552(a)(4)(B).

JANUARY 7, 2026 FOIA REQUEST TO DOJ

8. On January 7, 2026, Plaintiffs submitted a FOIA request to DOJ seeking the following records from the Office of Information Policy, the Office of the Attorney General, the Offices of the Deputy Attorney General, Associate Attorney General, Legal Policy, Public Affairs and the Office of Legislative Affairs:

> 1. All communications, such as emails, memos, letters, text messages, Signal chat messages, WhatsApp messages, Microsoft Teams messages, referencing the Epstein Files Transparency Act, H.R.4405 and the Department of Justice's implementation of the law. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted. You may omit news clippings and press releases.
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> 2. Talking points prepared by DOJ Public Affairs for Attorney General Pam Bondi, Assistant Attorney General Todd Blanche and the US Attorney for the Southern District of New York, Jay Clayton, referencing the Epstein Files Transparency Act, the release of the

Epstein Files, the Justice Department's review and redaction of the Epstein Files and the discovery of millions of additional pages of Epstein Files material. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

3. A spreadsheet or similar data or document identifying the total number of Justice Department personnel who have been reviewing and redacting the Epstein Files in order to prepare the files for release in response to the passage of the Epstein Files Transparency Act. PLEASE NOTE: I am not interested in personal identifiable information. I am only interested in the number of DOJ personnel who worked on the review and redaction of the files, their titles, and the offices/divisions they work in. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

4. The budget or a similar document identifying the total costs the DOJ has spent on the review and redaction of the Epstein Files since the passage of the Epstein Files Transparency Act. The timeframe for this part of the request is January 20, 2025 through the date the search for responsive records is conducted.

5. The number of Premium Pay hours DOJ personnel have spent on the review and redaction of the Epstein Files and the dollar amount in Premium Pay DOJ has paid to personnel for reviewing and redacting the Epstein Files. If the hours each DOJ attorney worked is captured in a document I request a copy of that document as well. The timeframe for this part of the request is January 20, 2025 through the date the search for responsive records is conducted.

6. Any and all documents related to overtime or Premium Pay hours worked by Office of Information Policy personnel between January 20, 2025 specifically related to the research, review and redaction of the Epstein Files. To be clear, I am not seeking individual time cards but instead broader statistics and analytics data reflecting hours worked on the Epstein Files.

7. Any written instruction, direction or guidance provided to DOJ personnel related to their review of the Epstein Files and copies of the processing guidelines, guidance, slide decks/PowerPoints and videos provided to DOJ personnel who are tasked with reviewing and redating the Epstein Files. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

8. All communications to/from the Office of Information Policy, the Office of the Attorney General, the Offices of the Deputy Attorney General, Associate Attorney General, Legal Policy, Public Affairs,

the Office of Legislative Affairs and the US Attorney's Office for the Southern District of New York referencing the Epstein Files. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

9. All communications to/from the Office of Legislative Affairs, the Office of the Attorney General and the Office of the Deputy Attorney General and any Representative, Senator or Congressional Committee referencing the Epstein Files. The timeframe for this part of the request is January 20, 2025 through the date the search for responsive records is conducted.

10. All communications, such as emails, memos, letters, text messages, Signal chat messages, WhatsApp messages, Microsoft Teams messages, referencing the discovery by the Southern District of New York and FBI "that they have uncovered over a million more documents potentially related to the Jeffrey Epstein case," according to a post by DOJ's official X account. https://x.com/TheJusticeDept/status/2003901580341334257

11. Any written instruction, direction or guidance provided to DOJ's Office of Public Affairs or the same types of records that derived from the Office of Public Affairs referencing the use of DOJ and DOJ Public Affairs' official accounts on X to engage directly with users related to the release of the Epstein Files and criticism over redactions and other matters related to the release of the records. For example, the @TheJusticeDept official X account responded to a user who raised questions about a photograph from the December 19, 2025 release by saying, "Because the law requires us to release all documents related to Jeffrey Epstein in our possession so that's what we are doing, you dope. Are you suggesting we break the law?" There are dozens of other instances in which the DOJ and DOJ public affairs X accounts disparaged others on X who raised questions about the release and redaction of the records. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

12. All communications between DOJ and FBI related to a letter from Jeffrey Epstein to Larry Nasar that was included in the release of Epstein Files by DOJ in December 2025. The official DOJ account posted on X that "The FBI has confirmed this alleged letter from Jeffrey Epstein to Larry Nassar is FAKE. The fake letter was received by the jail, and flagged for the FBI at the time." https://x.com/TheJusticeDept/status/2003574944483901816 The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

> 13. All records and communications (identical to the types of records mentioned in Part 1 of this request) referencing the discovery and inclusion of Donald Trump's name in the Epstein Files and all records and communications referencing the removal of certain records, including photographs, from DOJ's dedicated Epstein Files release page that showed and mentioned Donald Trump. By way of background, on December 19, 2025, the DOJ released the first tranche of Epstein Files in accordance with the Epstein Files Transparency Act. By Saturday, December 20, 2025, more than a dozen files were removed including one that shows President Trump's photo on a desk among several other photographs. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.
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> 14. All records and communications referencing DOJ's conclusion that the Epstein Files the Department has released in December 2025 "contain untrue and sensationalist claims made against President Trump that were submitted to the FBI right before the 2020 election. To be clear: the claims are unfounded and false, and if they had a shred of credibility, they certainly would have been weaponized against President Trump already." To be clear, the records I seek relate to the final conclusion/decision by DOJ that the references to Trump in the Epstein Files that were submitted to the FBI are "untrue" and "sensationalist." DOJ made this statement from its official X account on December 23, 2025. https://x.com/TheJusticeDept/status/2003442658643988641
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> 15. All records and communications referencing all categories of records released and withheld and a summary of redactions made, including legal basis. The timeframe for this request is November 18, 2025 through the date the search for responsive records is conducted.

9. A true and correct copy of the FOIA request is attached as Exhibit 1.

10. On January 15, 2026, DOJ acknowledged receipt of the FOIA request, assigned reference number FOIA-2026-01229 to the matter, denied Plaintiffs' request for expedited processing, and stated that it would require additional time to respond to the request due to "unusual circumstances."

11. A true and correct copy of the correspondence is attached as Exhibit 2.

12. On February 2, 2026, DOJ further acknowledged receipt of the FOIA request, described five categories of records search options available, and stated that it would focus its search on official correspondence and emails and attachments that are responsive to the FOIA request.

13. A true and correct copy of the correspondence is attached as Exhibit 3.

14. On April 8, 2026, Plaintiffs sought an estimated date of completion for the request.

15. A true and correct copy of the correspondence is attached as Exhibit 4.

16. DOJ did not send any further correspondence to Plaintiffs regarding this request.

17. As of the date of this filing, DOJ has not issued a determination on Plaintiffs' request.

18. As of the date of this filing, DOJ has failed to make any responsive records promptly available to Plaintiffs.

JANUARY 20, 2026 FOIA REQUEST TO DOJ

19. On January 20, 2026, Plaintiffs submitted a FOIA request to DOJ seeking the following records from the National Security Division ("DOJ-NSD") and Criminal Division ("DOJ-CRM"):

> 1. All communications, such as emails, memos, letters, text messages, Signal chat messages, WhatsApp messages, Microsoft Teams messages, referencing the Epstein Files Transparency Act, H.R.4405 and the Criminal Division and National Security Division's review and redaction of the Epstein files. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted. You may omit news clippings and press releases.
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> 2. All communications, such as emails, memos, letters, text messages, Signal chat messages, WhatsApp messages, Microsoft Teams messages, relating to the discovery of millions of additional pages of Epstein Files material as publicly disclosed on X by the Department of Justice in December 2025 https://x.com/TheJusticeDept/status/2003901580341334257. The

timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

3. A spreadsheet or similar data or document identifying the total number of Criminal Division and National Security Division personnel who have been reviewing and redacting the Epstein Files in order to prepare the files for release in response to the passage of the Epstein Files Transparency Act. PLEASE NOTE: I am not interested in personal identifiable information. I am only interested in the number of CRM and NSD personnel who worked on the review and redaction of the files, their titles, and the offices/divisions they work in. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

4. The number of Premium Pay hours NSD and CRM personnel have clocked in on their review and redaction of the Epstein Files and the dollar amount in Premium Pay NSD and CRM and DOJ has paid to NSD and CRM personnel for reviewing and redacting the Epstein Files. If the hours each NSD and DOJ attorney worked is captured in a document I request a copy of that document as well. The timeframe for this part of the request is January 20, 2025 through the date the search for responsive records is conducted.

5. Any written instruction, direction or guidance provided to NSD and CRM personnel/attorneys related to their review of the Epstein Files and copies of the processing guidelines, guidance, slide decks/PowerPoints and videos provided to NSD and CRM personnel who are tasked with reviewing and redacting the Epstein Files. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

6. All communications to/from the NSD and CRM Divisions referencing the "Epstein Files." The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

7. All records and communications (identical to the types of records mentioned in Part 1 of this request) referencing the discovery and inclusion of victims' names and personal information in the Epstein Files and all records and communications referencing the removal or redaction of personal identifiable information (PII).

20. A true and correct copy of the FOIA request is attached as Exhibit 5.

21. On January 22, 2026, DOJ-NSD acknowledged receipt of the FOIA request and assigned reference number #26-111 to the matter as it pertains to records in the possession of NSD.

22. A true and correct copy of the correspondence is attached as Exhibit 6.

23. On January 30, 2026, DOJ-CRM acknowledged receipt of the FOIA request and assigned reference number CRM-302409385 to the matter as it pertains to records in the possession of DOJ-CRM. DOJ-CRM also denied Plaintiffs' request for expedited processing.

24. A true and correct copy of the correspondence is attached as Exhibit 7.

25. On April 8, 2026, Plaintiffs sought an estimated date of completion for both the DOJ-NSD and DOJ-CRM portions of the request.

26. True and correct copies of the correspondence are included in Exhibit 8.

27. On April 8, 2026, DOJ-CRM provided an estimated date of completion of 12 months and stated that it would be able to provide Plaintiffs with a "more specific estimate" after it completes the search for responsive records. *Id*.

28. On April 10, 2026, DOJ-NSD stated that it was "unable to provide an estimated date of completion" and that "records searches have been initiated and are continuing." *Id*.

29. DOJ did not send any further correspondence to Plaintiffs regarding any portion of this request.

30. As of the date of this filing, DOJ has not issued a determination on Plaintiffs' request.

31. As of the date of this filing, DOJ has failed to make any responsive records promptly available to Plaintiffs.

FEBRUARY 6, 2026 FOIA REQUEST TO FBI

32. On February 6, 2026, Plaintiffs submitted a FOIA request to FBI seeking the following records:

> 1. All emails (including attachments) to/from the following email address: djb.dd@fbi.gov that references "Epstein." The timeframe for this request is March 1, 2025 through December 31, 2025.

> Please withhold news clippings, news summaries, listserv messages by the FBI's Public Affairs Office.

33. A true and correct copy of the FOIA request is attached as Exhibit 9.

34. On April 2, 2026, having not received any response to the FOIA request, Plaintiffs sent a follow-up message to FBI inquiring about the status of the request.

35. A true and correct copy of the correspondence is attached as Exhibit 10.

36. On April 15, 2026, FBI acknowledged receipt of the FOIA request, assigned reference number 1732049-000 to the matter, and stated that it would require additional time to respond to the FOIA request due to "unusual circumstances."

37. A true and correct copy of the correspondence is attached as Exhibit 11.

38. FBI did not send any further correspondence to Plaintiffs regarding this request.

39. As of the date of this filing, FBI has not issued a determination on Plaintiffs' request.

40. As of the date of this filing, FBI has failed to make any responsive records promptly available to Plaintiffs.

MARCH 20, 2026 FOIA REQUEST TO FBI

41. On March 20, 2026, Plaintiffs submitted a FOIA request to FBI seeking the following records:

> 1. Any directive, memo, letter or email sent to the RIDS Section Chief or immediate deputies and aides, by FBI Director Kash Patel, his deputy, Dan Bongino, or his immediate deputy or aides between November 18, 2025 and the present ordering RIDS personnel and personnel/agents from the FBI's New York and Washington Field to review and redact the Jeffrey Epstein and Ghislaine Maxwell files in accordance with the Epstein Files Transparency Act.
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> 2. A spreadsheet or similar data or document identifying the total number of FBI personnel who worked on processing, reviewing, redacting the Jeffrey Epstein files between November 18, 2025 and the present. PLEASE NOTE: I am not interested in personal identifiable information. I am only interested in the number of FBI

personnel who worked on this matter, their titles, and the field offices/divisions they work(ed) in.

3. The number of Premium Pay hours FBI personnel have spent on the review and redaction of the Epstein Files and the dollar amount in Premium Pay FBI has paid to personnel for reviewing and redacting the Epstein Files in response to the passage of the Epstein Files Transparency Act. If the hours each FBI employee worked is captured in a document I request a copy of that document as well. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

4. A budgetary document or dataset (if any such document exists) or a similar document or dataset identifying the total costs for FBI personnel to process, review and redact the Epstein Files in response to the November 18, 2025 passage of the Epstein Files Transparency Act. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

5. Any documented instruction or direction provided to FBI personnel on how to process, review and redact the Epstein Files in accordance with the guidance set forth in the Epstein Files Transparency Act. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

6. A copy of the processing guidelines, guidance or slide decks used by FBI employees who are tasked with reviewing and processing Jeffrey Epstein files following the passage of the Epstein Files Transparency Act. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

7. All communications to/from RIDS, the Office of the Director, the Deputy Director, the FBI NY and Washington, DC field Offices, the Resource Planning Office, and the Office of the Attorney General, the Office of the Deputy Attorney General, DOJ Public Affairs and the US Attorney's Office for the Southern District of New York referencing the Epstein Files and the Epstein Files Transparency Act. The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.

8. All communications between FBI and DOJ related to a letter from Jeffrey Epstein to Larry Nasar that was included in the release of Epstein Files by DOJ in December 2025. The official DOJ account posted on X a statement that said "The FBI has confirmed this alleged letter from Jeffrey Epstein to Larry Nassar is FAKE. The fake letter was received by the jail, and flagged for the FBI at the time." https://x.com/TheJusticeDept/status/2003574944483901816

> The timeframe for this part of the request is November 18, 2025 through the date the search for responsive records is conducted.
>
> 9. All records and communications referencing the discovery and inclusion of Donald Trump's name in the Epstein Files. The timeframe for this part of the request is February 1, 2025 through the date the search for responsive records is conducted.
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> 10. All communications, such as emails, memos, letters, text messages, Signal chat messages, referencing DOJ's conclusion that the Epstein Files the Department released in December 2025 "contain untrue and sensationalist claims made against President Trump that were submitted to the FBI right before the 2020 election. The claims are unfounded and false, and if they had a shred of credibility, they certainly would have been weaponized against President Trump already." It appears DOJ may in part be referring to tips sent to FBI that contained incendiary claims that Donald Trump sexually abused a young woman. To be clear, the records I am seeking relate to the FBI's "conclusion right before the 2020 election"; that certain references to Trump in the Epstein Files are "untrue" and "sensationalist." DOJ made this statement from its official X account on December 23, 2025. https://x.com/TheJusticeDept/status/2003442658643988641

42. A true and correct copy of the FOIA request is attached as Exhibit 12.

43. On March 30, 2026, FBI acknowledged receipt of the FOIA request and assigned reference number 1728964-000 to the matter.

44. A true and correct copy of the correspondence is attached as Exhibit 13.

45. On April 8, 2026, Plaintiffs sought an estimated date of completion for the request.

46. A true and correct copy of the correspondence is attached as Exhibit 14.

47. On April 9, 2026, FBI stated that the request is "in Initial Processing" and the "assigned analyst is searching for, retrieving, and reviewing potentially responsive records" and provided an estimated date of completion of 2,010 days. *Id*.

48. FBI did not send any further correspondence to Plaintiffs regarding this request.

49. As of the date of this filing, FBI has not issued a determination on Plaintiffs' request.

50. As of the date of this filing, FBI has failed to make any responsive records promptly available to Plaintiffs.

COUNT I – DOJ'S FOIA VIOLATION
JANUARY 7, 2026 FOIA REQUEST TO DOJ

51. Paragraphs 1-50 are incorporated by reference.

52. Plaintiffs' FOIA request seeks the disclosure of agency records and was properly made.

53. Defendant DOJ is a federal agency subject to FOIA.

54. Included within the scope of the request are one or more records or portions of records that are not exempt under FOIA.

55. Defendant DOJ has failed to conduct a reasonable search for records responsive to the request.

56. Defendant DOJ has failed to issue a determination within the statutory deadline.

57. Defendant DOJ has failed to produce all non-exempt records responsive to the request.

COUNT II – DOJ'S FOIA VIOLATION
JANUARY 20, 2026 FOIA REQUEST TO DOJ

58. Paragraphs 1-50 are incorporated by reference.

59. Plaintiffs' FOIA request seeks the disclosure of agency records and was properly made.

60. Defendant DOJ is a federal agency subject to FOIA.

61. Included within the scope of the request are one or more records or portions of records that are not exempt under FOIA.

62. Defendant DOJ has failed to conduct a reasonable search for records responsive to the request.

63. Defendant DOJ has failed to issue a determination within the statutory deadline.

64. Defendant DOJ has failed to produce all non-exempt records responsive to the request.

COUNT III – FBI'S FOIA VIOLATION
FEBRUARY 6, 2026 FOIA REQUEST TO FBI

65. Paragraphs 1-50 are incorporated by reference.

66. Plaintiffs' FOIA request seeks the disclosure of agency records and was properly made.

67. Defendant FBI is a federal agency subject to FOIA.

68. Included within the scope of the request are one or more records or portions of records that are not exempt under FOIA.

69. Defendant FBI has failed to conduct a reasonable search for records responsive to the request.

70. Defendant FBI has failed to issue a determination within the statutory deadline.

71. Defendant FBI has failed to produce all non-exempt records responsive to the request.

COUNT IV – FBI'S FOIA VIOLATION
MARCH 20, 2026 FOIA REQUEST TO FBI

72. Paragraphs 1-50 are incorporated by reference.

73. Plaintiffs' FOIA request seeks the disclosure of agency records and was properly made.

74. Defendant FBI is a federal agency subject to FOIA.

75. Included within the scope of the request are one or more records or portions of records that are not exempt under FOIA.

76. Defendant FBI has failed to conduct a reasonable search for records responsive to the request.

77. Defendant FBI has failed to issue a determination within the statutory deadline.

78. Defendant FBI has failed to produce all non-exempt records responsive to the request.

WHEREFORE, Plaintiffs ask the Court to:

i. declare that Defendants have violated FOIA;

ii. order Defendants to conduct a reasonable search for records and to produce the requested records promptly;

iii. enjoin Defendants from withholding non-exempt public records under FOIA;

iv. award Plaintiffs attorneys' fees and costs; and

v. award such other relief the Court considers appropriate.

Dated: June 4, 2026

RESPECTFULLY SUBMITTED,

/s/ Matthew V. Topic

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