

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
Southern Division**

LEGAL EAGLE, LLC  
1050 Connecticut Avenue, NW  
Suite 5038  
Washington, DC 20036,

and

NATIONAL SECURITY COUNSELORS,  
INC.  
1451 Rockville Pike  
Suite 250  
Rockville, MD 20852  
Montgomery County

Plaintiffs,

v.

NATIONAL ARCHIVES AND  
RECORDS ADMINISTRATION  
8601 Adelphi Road  
College Park, MD 20740,

Defendant.

Civil Action No. 8:26-cv-00847

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**COMPLAINT**

Plaintiffs Legal Eagle, LLC and National Security Counselors, Inc. bring this action against Defendant National Archives and Records Administration pursuant to the Freedom of Information Act, 5 U.S.C. § 552, *et seq.*, as amended (“FOIA”), the Federal Declaratory Judgment Act, 28 U.S.C. § 2201, and the All Writs Act, 28 U.S.C. § 1651.

**JURISDICTION**

1. This Court has both subject matter jurisdiction over this action and personal jurisdiction over Defendant pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331.

**VENUE**

2. Venue is appropriate under 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391.

**PARTIES**

3. Plaintiff Legal Eagle, LLC (“Legal Eagle”) is a business headquartered in the District of Columbia. Legal Eagle runs the LegalEagle YouTube channel (<https://www.youtube.com/legaleagle>), which is the most popular long form YouTube channel focused on legal issues—as well as one of the fastest growing educational channels in the world—with more than three million subscribers, fifteen million monthly views, and nearly one billion total video views. Legal Eagle is accordingly a representative of the news media within the meaning of 5 U.S.C. § 552(a)(4)(A).

4. Plaintiff National Security Counselors, Inc. (“NSC”) is a non-profit public interest law firm incorporated in 2010 in the Commonwealth of Virginia as a tax-exempt charitable organization, which is currently headquartered in the state of Maryland. NSC uses research, litigation, and communications to inform the public about legal issues involving the federal Government and has the ability to disseminate information on a wide scale. As part of its research, NSC uses government records made available to it under FOIA as well as Government records that agencies have made available to the general public.

5. Defendant National Archives and Records Administration (“NARA”) is an agency within the meaning of 5 U.S.C. § 552(f) and is in possession and/or control of the records requested by Plaintiffs which are the subject of this action.

6. The Donald J. Trump Presidential Library (“Trump Library”) is a NARA component.

**BACKGROUND**

**TRUMP I PRESIDENTIAL RECORDS AND FOIA**

7. According to the Presidential Records Act, 44 U.S.C. § 2204, all Presidential records—with limited exceptions—become subject to FOIA five years after the end of the President’s last consecutive term.

8. President Donald Trump’s first term ended on 20 January 2021.

9. Accordingly, all Presidential records from President Trump’s first term became subject to FOIA on 20 January 2026.

10. FOIA requests for Presidential records are submitted to the appropriate Presidential Library.

11. FOIA requests for Presidential records from President Trump’s first term are submitted to the Donald J. Trump Presidential Library and may be submitted by online form, email, or United States Postal Service.

12. All FOIA requests in this Complaint pertain to rules, guidelines, or controlling legal opinions from President Trump’s first term.

**CAUSES OF ACTION**

**FIRST CAUSE OF ACTION**

**(CONSTRUCTIVE RECORDS DENIAL – 26-19570-F)**

13. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

14. On 20 January 2026, NSC submitted to the Trump Library via email a FOIA request for “all numbered policy documents (e.g. rules, regulations, guidelines, directives, etc.)

issued by the Office of Administration including the terms ‘security,’ ‘review,’ ‘access,’ ‘records,’ ‘preserve,’ ‘preservation,’ ‘clearance,’ or ‘counsel.’”

15. NSC added, “Please process the responsive records but do not send us copies. Once you have completed your processing, please notify me so that we can make arrangements for someone to review them at an appropriate National Archives facility.”

16. On 28 January 2026, Legal Eagle, through undersigned counsel, instructed the Trump Library by email to add it as a co-requester to NSC’s request.

17. On 18 February 2026, the Trump Library acknowledged receipt of this request and assigned it Request No. 26-19570-F.

18. On 18 February 2026, the Trump Library advised Plaintiffs that it had limited Request No. 26-19570-F to unclassified records.

19. As of this writing, the Trump Library has not issued a final response to Plaintiffs’ request.

20. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

## **SECOND CAUSE OF ACTION**

### **(CONSTRUCTIVE RECORDS DENIAL – NW 90814)**

21. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

22. On 18 February 2026, the Trump Library advised Plaintiffs that it had assigned Request No. NW 90814 to the request for classified records responsive to Request No. 26-19570-F.

23. As of this writing, the Trump Library has not issued a final response to Plaintiffs' request.

24. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

### **THIRD CAUSE OF ACTION**

#### **(CONSTRUCTIVE RECORDS DENIAL – 26-19595-F)**

25. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

26. On 20 January 2026, NSC submitted to the Trump Library via email a FOIA request for “all Department of Justice Office of Legal Counsel opinions written to the [Counsel] to the President.”<sup>1</sup>

27. NSC added, “Please process the responsive records but do not send us copies. Once you have completed your processing, please notify me so that we can make arrangements for someone to review them at an appropriate National Archives facility.”

28. On 28 January 2026, Legal Eagle, through undersigned counsel, instructed the Trump Library by email to add it as a co-requester to NSC's request.

29. On 18 February 2026, the Trump Library acknowledged receipt of this request and assigned it Request No. 26-19595-F.

30. On 18 February 2026, the Trump Library advised Plaintiffs that it had limited Request No. 26-19595-F to unclassified records.

31. As of this writing, the Trump Library has not issued a final response to Plaintiffs' request.

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<sup>1</sup> The original request included the typographical error “Council,” which was later corrected.

32. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

**FOURTH CAUSE OF ACTION**

**(CONSTRUCTIVE RECORDS DENIAL – NW 90815)**

33. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

34. On 18 February 2026, the Trump Library advised Plaintiffs that it had assigned Request No. NW 90815 to the request for classified records responsive to Request No. 26-19595-F.

35. As of this writing, the Trump Library has not issued a final response to Plaintiffs' request.

36. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

**FIFTH CAUSE OF ACTION**

**(CONSTRUCTIVE RECORDS DENIAL – 26-19605-F)**

37. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

38. On 20 January 2026, NSC submitted to the Trump Library via email a FOIA request for “all Department of Justice Office of Legal Counsel opinions written to the National Security Council.”

39. NSC added, “Please process the responsive records but do not send us copies. Once you have completed your processing, please notify me so that we can make arrangements for someone to review them at an appropriate National Archives facility.”

40. On 28 January 2026, Legal Eagle, through undersigned counsel, instructed the Trump Library by email to add it as a co-requester to NSC's request.

41. On 18 February 2026, the Trump Library acknowledged receipt of this request and assigned it Request No. 26-19605-F.

42. On 18 February 2026, the Trump Library advised Plaintiffs that it had limited Request No. 26-19605-F to unclassified records.

43. As of this writing, the Trump Library has not issued a final response to Plaintiffs' request.

44. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

#### **SIXTH CAUSE OF ACTION**

#### **(CONSTRUCTIVE RECORDS DENIAL – NW 90816)**

45. Plaintiffs repeat and reallege the allegations contained in paragraphs 1-12 set forth above.

46. On 18 February 2026, the Trump Library advised Plaintiffs that it had assigned Request No. NW 90816 to the request for classified records responsive to Request No. 26-19605-F.

47. As of this writing, the Trump Library has not issued a final response to Plaintiffs' request.

48. Plaintiffs have a legal right under FOIA to obtain the records they seek, and there is no legal basis for the denial by the Trump Library of said right.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs Legal Eagle, LLC and National Security Counselors, Inc. pray that this Court:

- (1) Order the Donald J. Trump Presidential Library to make all responsive records available to Plaintiffs;
- (2) Order preliminary and permanent injunctive and/or declaratory relief as may be appropriate;
- (3) Award reasonable costs and attorneys' fees as provided in 5 U.S.C. § 552(a)(4)(E), 28 U.S.C. § 2412(d), or any other applicable law;
- (4) Expedite this action in every way pursuant to 28 U.S.C. § 1657(a); and
- (5) Grant such other relief as the Court may deem just and proper.

Date: March 1, 2026

Respectfully submitted,

/s/ Kelly B. McClanahan  
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*Counsel for Plaintiffs*