

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

DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE, #15180
Washington, DC 20003

Plaintiff,

v.

FEDERAL BUREAU OF INVESTIGATION
935 Pennsylvania Avenue NW
Washington, DC 20535

Defendant.

Civil Action No. 1:26-cv-1935

COMPLAINT

PRELIMINARY STATEMENT

1. Plaintiff Democracy Defenders Fund (“DDF”) brings this action against the Federal Bureau of Investigation (“FBI”) under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, seeking declaratory and injunctive relief to compel the expeditious release of agency records concerning FBI Director Kash Patel’s (“Director Patel” or “Mr. Patel”) trip to Italy in February 2026, including his attendance at the 2026 Winter Olympics.

2. The requested records contain vital information that the American public needs in order to assess whether Director Patel, who is the head of the primary investigative agency of the United States, is potentially misusing or wasting government resources in violation of federal law.

3. On February 27, 2026, Plaintiff submitted a FOIA request (“Request”) to the Federal Bureau of Investigation for eleven categories of records related to Director Patel’s trip to the 2026 Winter Olympics in Milan, Italy. Plaintiff included a request for expedited processing, fee waiver, and news media fee status.

4. Defendant divided Plaintiff's Request into 9 tranches and assigned nine separate request numbers to Plaintiffs' Request.

5. To date, Defendant has failed to make a determination or provide any responsive documents for eight of these request numbers.¹

6. Defendant failed to comply with the statutory deadline set forth under FOIA, 5 U.S.C. § 552(a)(6)(A)(i). Plaintiff respectfully asks the Court to compel the expeditious release of the requested agency records.

JURISDICTION AND VENUE

7. This Court has subject matter jurisdiction over this action pursuant to 5 U.S.C. §§ 552(a)(4)(B) and(a)(6)(E)(iii), 28 U.S.C. §1331 because it arises under federal law, and the Declaratory Judgment Act, 28 U.S.C. §§ 2201, and 2202.

8. Venue is proper in this district pursuant to 5 U.S.C. § 552(a)(4)(B) because Plaintiff resides and has its principal place of business in this district, and 28 U.S.C. § 1391(e) because Defendant is a federal agency acting in its official capacity who performs its official duties in the District of Columbia, and a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in this district.

9. Because Defendant failed to comply with the applicable time-limit provisions of FOIA, Plaintiff has exhausted its administrative remedies pursuant to 5 U.S.C. § 552(a)(6)(C)(i) and is now entitled to judicial review.

¹ In a letter dated April 22, 2026, Defendant notified DDF that it was unable to identify records responsive to one request number and as a result it was closing the request. DDF administratively appealed this decision on May 14, 2026. DDF reserves the right to amend its complaint to seek judicial review of the agency's decision on appeal with respect to this remaining request number once the agency issues its decision or the deadline for issuing a decision has passed, whichever occurs first.

10. This Court has the authority to grant declaratory relief pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*

11. This Court has the authority to award reasonable costs and attorneys' fees under 5 U.S.C. § 552(a)(4)(E).

PARTIES

12. Plaintiff DDF is a national nonpartisan, non-profit section 501(c)(3) organization committed to defending and strengthening democracy while ensuring that all Americans can freely exercise their fundamental civil rights by defending the rule of law, fighting corruption, and protecting elections. DDF strategically uses FOIA and public records requests to gather and analyze information to shine a light on abuses of power. DDF's public dissemination and media outreach are extensive, allowing it to connect with a vast and diverse audience across various platforms, making it uniquely positioned to effectively inform the public about matters of national significance. The organization is incorporated under the laws of the District of Columbia.

13. Defendant FBI, a component of the Department of Justice, is an agency of the United States under 5 U.S.C. § 552(f)(1). FBI is headquartered in Washington, D.C.

FACTS

Background Regarding Director Patel's Trip to Italy Included in the Request

14. On February 22, 2026, a trespasser armed with a shotgun and gas tank breached the security perimeter at Mar-a-Lago and was shot and killed after pointing the weapon at Secret Service agents and a sheriff's deputy.²

² Hannah Phillips, *Here's what officials have said about Trump's Mar-a-Lago shooting*, USA Today (Feb. 22, 2026), <https://www.usatoday.com/story/news/trump/2026/02/22/what-we-know-after-fatal-breach-at-donald-trump-mar-a-lago-club-palm-beach-estate-man-break-in-shot/88811943007/>.

15. Around the same time, violence erupted in Mexico following the death of Jalisco New Generation Cartel leader Nemesio Cervantes, including near the U.S.-Mexico border,³ and President Trump publicly suggested that the United States might strike Iran.⁴

16. Despite these significant national security events, FBI Director Patel was in Italy attending the 2026 Olympic Games, watching the men's hockey final from what appears to be a skybox⁵ and chugging beer in the locker room of the U.S. men's hockey team.⁶

17. Director Patel traveled to and from Italy on government aircraft at a reported cost of \$75,000 to the American taxpayer.⁷

18. Prices to attend Olympic events varied, but tickets to the men's hockey final ranged between \$500 and \$1,600.⁸

³ Dina Arévalo, *Mexico cartel boss killed, violence flares near South Texas border*, San Antonio News (Feb. 23, 2026), <https://www.mysanantonio.com/news/south-texas/article/rio-grande-valley-cartel-violence-21853761.php>.

⁴ Francesca Chambers & Cybele Mayes-Osterman, *Will the US attack Iran? Trump weighs options, floats limited strike*, USA Today (Feb. 21, 2026), <https://www.usatoday.com/story/news/politics/2026/02/21/trump-iran-military-strike-options/88778926007/>.

⁵ Alexander Smith, *FBI head Kash Patel celebrates with men's hockey team amid major probes in U.S.*, NBC News (Feb. 23, 2026), <https://www.nbcnews.com/news/us-news/kash-patel-fbi-celebrates-mens-hockey-team-winter-olympics-milan-video-rcna260215>.

⁶ Erkki Forster & Catherine Bouris, *Keystone Kash Slammed for Boozing at Olympics Amid Multiple Crises*, The Daily Beast (Feb. 23, 2026), <https://www.thedailybeast.com/keystone-kash-slammed-for-boozing-at-olympics-amid-multiple-crises/>.

⁷ Carol Lennig & Ken Dilanian, *Kash Patel heads to Milan for the Olympics –on the FBI Jet*, MS Now (Feb. 19, 2026), <https://www.ms.now/news/kash-patel-headed-to-milan-for-the-olympics-on-the-fbi-jet>

⁸ Chad de Guzman, *The Cost of Attending the 2026 Olympic Games*, TIME (Jan. 28, 2026), <https://time.com/7357812/milano-cortina-2026-olympics-cost/>; ASSOCIATED PRESS, *Ticket prices for the 2026 Milan-Cortina Winter Olympics range from 30 to nearly 3,000 euros* (Oct. 3, 2024), <https://apnews.com/article/2026-olympics-ticket-prices-b980535ab3ea83aa92b75e5e0babf3>.

19. FBI spokesperson Ben Williamson claimed the trip was not personal and involved official meetings with Italian law enforcement, security officials, and diplomatic personnel.⁹ The *New York Times*, however, reported that an internal schedule indicated Director Patel had substantial personal and leisure time on his trip,¹⁰ and former FBI Deputy Director Andrew McCabe, speaking on *CNN*, said meetings regarding security for Olympic events happen months, not days, before the Olympics.¹¹

20. Director Patel's use of government aircraft for personal travel has been the subject of multiple congressional inquiries and requests for investigation concerning potential misuse of appropriated funds.

21. Senator Richard "Dick" Durbin sent two letters to the Government Accountability Office and the Department of Justice's Office of Inspector General requesting an investigation into Director Patel's use of government aircraft to attend professional hockey games, to visit his girlfriend,¹² and to attend the 2026 Olympics.¹³

22. In December 2025, Democrats on the House Judiciary Committee sent a request to Director Patel seeking information on his frequent use of government aircraft for traveling to visit

⁹ Ben Williamson (@_WilliamsonBen), X.com (Feb. 19, 2026), https://x.com/_WilliamsonBen/status/2024605212858630465?s=20.

¹⁰ Glenn Thrush, *Kash Patel's Olympics Schedule Left Plenty of Time for Leisure*, The New York Times (Feb. 24, 2026), <https://www.nytimes.com/2026/02/24/us/politics/kash-patel-fbi-olympics-milan.html?smid=nytcore-ios-share>.

¹¹ *The Lead with Jake Tapper*, CNN (Feb. 24, 2026), <https://www.cnn.com/audio/podcasts/the-lead-with-jake-tapper/episodes/747ff38e-b8ed-11f0-a395-435a199c94dc> (15:00 mark).

¹² Letter from Sen. Richard J. Durbin, Ranking Member, U.S. Senate Committee on the Judiciary (May 7, 2025), 2025-5-07 Letter to GAO re Executives use of aircraft for nonmission purposes.pdf; see also Josh Fiallo, *Jet-Set Kash Patel Took FBI Plane to NHL Game and GF's City*, *THE DAILY BEAST* (Apr. 20, 2025), <https://www.thedailybeast.com/kash-patel-took-fbi-jet-to-nhl-game-and-girlfriends-city>.

¹³ Letter from Sen. Richard J. Durbin, Ranking Member, U.S. Senate Committee on the Judiciary (Feb. 24, 2026), 2026-02-24 Letter to GAO and DOJ IG on Kash Patel Olympic Travel.pdf.

his girlfriend, to Scotland for golf with friends, and to a luxury hunting retreat called “Boondoggle Ranch.”¹⁴

DDF’s FOIA Request

23. Based on DDF’s anti-corruption and rule of law mission, DDF submitted a FOIA request to the FBI on February 27, 2026.¹⁵ Specifically, DDF requested the following eleven categories of records:

1. All travel authorizations or approvals for the use of government aircraft and any expenses related to the use of such aircraft in connection with Federal Bureau of Investigation (FBI) Director Kash Patel’s trip to Italy in February 2026, including his attendance at the 2026 Winter Olympics, including any blanket approval under 41 C.F.R. § 301-10.262 and any authorization or approval for any non-federal traveler to travel with Director Patel.
2. Any itinerary or agenda prepared for Director Patel’s official, personal, and political meetings during his February 2026 trip to Italy, including any events held at or during the 2026 Winter Olympics.
3. Any of the following forms prepared by Director Patel, his personal assistant Nicole Rucker, or any other person for or on behalf of Director Patel between Feb. 1-25, 2026:
 - a. FD-772 or other form to report foreign travel outside the U.S. by FBI personnel
 - b. 2SF-1012 Travel Voucher
 - c. GSA Form 3641 Senior Federal Travel Form as submitted to GSA
 - d. OPM-71 Request for Leave or Approved Absence
 - e. Any other document providing an accounting for Director Patel’s official, personal, and political time while attending the 2026 Winter Olympics
4. Any briefing books or advance materials prepared for Director Patel’s meetings with any of the following:

¹⁴ Letter from Representative Jamie Raskin and Representative Kamlager-Dove (Dec. 1, 2025), [2025-12-01-raskin-kamlager-dove-to-patel-fbi-re-plane.pdf](#); *see also* Adam Downer, *Keystone Kash Accused of Using \$60M FBI Jet for Date Night*, THE DAILY BEAST (Oct. 29, 2025), <https://www.thedailybeast.com/kash-patel-accused-of-using-gov-jet-for-date-night/>; Sadie Gurman, et al., *Kash Patel’s ‘Effin Wild’ Ride as FBI Director*, WALL ST. J., (Nov. 11, 2025), <https://www.wsj.com/politics/policy/kash-patel-private-jet-flights-fbi-197da8fd>; Amy McCarthy, *Kash Patel Takes \$60M FBI Jet to See Girlfriend 2 Years After Slamming His Predecessor for Using Government Plane*, PEOPLE (Nov. 4, 2025), [https://people.com/kash-patel-takes-60m-fbi-jetto-see-girlfriend-2-years-after-slamming-predecessor-for-using-gove rnment-plane-11842772](https://people.com/kash-patel-takes-60m-fbi-jetto-see-girlfriend-2-years-after-slamming-predecessor-for-using-gove- rnment-plane-11842772).

¹⁵ Attached as Exhibit A.

- a. Tilman J. Fertitta, US Ambassador to Italy and San Marino
 - b. Matthew Whitaker, US Ambassador to NATO
 - c. Luca Garavoglia, Italian billionaire businessman, and chairman of the Campari Group, who hosted a dinner attended by Patel, Fertitta, Whitaker, and others on or around Feb. 21, 2026
 - d. Mike Sullivan, Coach of men's U.S. Olympic hockey team
5. Any advice, determination, authorization, or opinion concerning the acceptance by Director Patel, directly or indirectly, personally or on behalf of the United States, of any gift from any person in connection with his trip to the 2026 Winter Olympics, including but not limited to:
 - a. Any advice, determination, authorization, or opinion that a gift does or does not qualify for an exclusion from the definition of a "gift" for purposes of 5 C.F.R. 2635.203(b)
 - b. Any advice, determination, authorization, or opinion that a gift does or does not qualify for an exception pursuant to 5 C.F.R. 2635.204, including the "widely attended gathering" exception at 5 C.F.R. 2635.204(g)
 - c. Any advice, determination, authorization, or opinion that a gift is or is not required to be disposed of pursuant to 5 C.F.R. 2635.206
 - d. Any advice, determination, authorization, or opinion that a gift can or may be accepted pursuant to a statutory gift authorization
 - e. Any advice, determination, authorization, or opinion concerning the acceptance of non-federal source travel payments pursuant to 31 U.S.C. 1353
 - f. Any advice, determination, authorization, or opinion concerning the acceptance of gifts pursuant to 5 U.S.C. 7342 or the Foreign Emoluments Clause of the United States Constitution
 6. Any records held by the FBI Office of Integrity and Compliance or the DOJ Departmental Ethics Office regarding Director Patel's locker room appearances, consumption of alcohol, or use of official social media in relation to the Olympics.
 7. Any authorization for the advancement or reimbursement of transportation, lodging, subsistence, or other travel-related expenses to Director Patel or any private person accompanying Director Patel in connection with his trip to the 2026 Winter Olympics.
 8. Any documents or records discussing the amount of reimbursement required to be paid by Director Patel for use of any government aircraft for personal use in connection with his trip to the 2026 Winter Olympics.
 9. Any communications to, from, and between Director Patel and any other person concerning his February 2026 trip to Italy, including any communications concerning his attendance at the 2026 Winter Olympics.
 10. All direct messages to or from the X accounts @WilliamsonBen or @FBIDirectorKash from February 16-23, 2026

11. Any communications created between Feb. 16-23 to or from Director Patel, his personal assistant Nicole Rucker, FBI Assistant Director for Public Affairs Ben Williamson, or FBI Office of Congressional Affairs Assistant Director Marshall Yates (“these officials”) containing any of the following keywords
 - a. Italy
 - b. Tilman
 - c. Fertitta
 - d. Whitaker
 - e. Luca
 - f. Garavoglia
 - g. Congress
 - h. Epstein
 - i. Olympics
 - j. Gaudreau
 - k. Campari
 - l. Aperol
 - m. Hockey
 - n. Milan
 - o. MSNOW
 - p. Mamdani
 - q. Girlfriend
 - r. Nashville
 - s. podcast
 - t. media
 - u. journalist
 - v. rag
 - w. celebration
 - x. Boondoggle
 - y. Raskin
 - z. Durbin
 - aa. Judiciary
 - bb. Unity
 - cc. Sacrifice
 - dd. Attitude
 - ee. plane
 - ff. jet
 - gg. fly/flight
 - hh. McCabe
 - ii. Mueller

24. DDF requested that the FBI search the primary accounts and mobile devices for these officials, as well as any other email addresses, accounts, or devices that these officials use for official business.

25. DDF requested that the FBI include in the searches any personal staff reporting to these officials who are responsible for managing, sending, or receiving official correspondence on behalf of these officials, including specifically Nicole Rucker and any staff assistant or special assistant reporting directly to Assistant Director Williamson, and any Public Affairs Officers (“PAOs”) assigned specifically to work on media inquiries relating to Director Patel. DDF noted that responsive records may also be held by the Executive Secretariat in the Office of the Director or Liaison Staff who coordinated with Ambassadors Fertitta and Whitaker.

26. DDF requested a waiver of fees associated with processing the request for records under 5 U.S.C. § 552(a)(4)(A) and 28 C.F.R. § 16.10(k).

27. DDF requested expedited processing pursuant to 5 U.S.C. § 552(a)(6)(E)(ii) and 28 C.F.R. § 16.5(e)(ii) on the basis that prompt release of Director Patel’s Olympic-related records is necessary given the immediate public interest and ongoing public debate regarding the propriety of the FBI Director’s use of government resources to attend recreational events and that DDF is primarily engaged in disseminating information.

28. DDF requested expedited processing pursuant to 5 U.S.C. § 552(a)(6)(E)(ii) and 28 C.F.R. § 16.5(e)(iv) on the basis that there is widespread media interest in the propriety of Director Patel’s use of government resources, particularly regarding his travel to and attendance of the 2026 Olympics, that affect the American public’s confidence.

The FBI’s Responses to DDF’s FOIA Request

29. The FBI sent nine separate letters, dated March 17-19, 2026, acknowledging receipt of DDF’s Request. The FBI divided Plaintiff’s request into nine tranches, assigning each a different request number. Those categories and their respective request numbers are:

1. Travel to Italy in February 2026, Request No. 1725011-000;

2. Forms Prepared by or for Director Patel Regarding Travel and Leave, Request No. 1726894-000;
3. Briefing Books or Advance Materials Prepared for Director Patel's meetings with Specific People, Request No. 1726953-000;
4. Advice, Determinations, and Authorizations regarding Gifts in Connection with Trip to 2026 Winter Olympics, Request No. 1726982-000;
5. Records Concerning Locker Room Appearance and Official Use of Social Media Relating to the 2026 Winter Olympics, Request No. 1727123-000;
6. Travel Reimbursement for Trip to 2026 Winter Olympics, Request No. 1727145-000;
7. Communications Regarding February 2026 Trip to Italy, Request No. 1727170-000; and
8. Communications Between Director Patel and Specific Individuals, Request No. 1727418-000.

30. The FBI sent nine separate letters, dated March 17-19, 2026, advising DDF that "unusual circumstances" applied to the processing of each category and request number assigned by the FBI to DDF's Request. The FBI further stated that its response to each request number would be delayed.

31. The FBI then sent DDF a letter dated April 22, 2026, closing out FOIPA Request No. 1727123-000, "RECORDS CONCERNING LOCKER ROOM APPEARANCE AND OFFICAL USE OF SOCIAL MEDIA RELATION TO THE 2026 WINTER OLYMPICS,"¹⁶ on the basis that no responsive records exist. (Ex. B)

32. On May 14, 2026, DDF appealed this denial on the grounds that the FBI failed to conduct an adequate search or provide a sufficient explanation for its blanket refusal to produce responsive records.¹⁷ (Ex. K).

¹⁶ A copy is attached as Exhibit B.

¹⁷A copy is attached as Exhibit K.

33. Defendant FBI sent DDF letters dated May 6, 2026, denying expedited processing for the following categories of records the FBI created for DDF's request:¹⁸

1. FOIPA Request No. 1725011-000, "TRAVEL TO ITALY IN FEBRUARY 2026," (Ex. C);
2. FOIPA Request No. 1726982-000, "ADVICE, DETERMINATIONS AND AUTHORIZATIONS REGARDING GIFTS IN CONNECTION WITH TRIP TO 2026 OLYMPICS" (Ex. D);
3. FOIPA Request No. 1727145-000, "TRAVEL REIMBURSEMENT FOR TRIP TO 2026 WINTER OLYMPICS" (Ex. E);
4. FOIPA Request No. 1727170-000, "COMMUNICATIONS REGARDING FEBRUARY 2026 TRIP TO ITALY" (Ex. F);
5. FOIPA Request No. 1826953-000, "Briefing Books or Advance Materials Prepared for Director Patel's Meetings with Specific People (On or Around February 21, 2026)" (Ex. G); and
6. FOIPA Request No. 1726894-000, "Forms Prepared by or for Director Patel Regarding Travel and Leave (February 1, 2026 - February 25, 2026)" (Ex. H).

34. Defendant sent two additional letters, dated May 7 and 8, 2026, denying DDF's request for expedited processing of the remaining categories of records:¹⁹

¹⁸ True and correct copies of all six requests are attached here as Exhibits C, D, E, F, G, and H, respectively.

¹⁹ True and correct copies of both requests are attached here as Exhibits I and J.

1. FOIPA Request No. 1727123-000, “RECORDS CONCERNING LOCKER ROOM APPEARANCE AND OFFICIAL USE OF SOCIAL MEDIA RELATING TO THE 2026 WINTER OLYMPICS” (Ex. I); and
2. FOIA Request No. 1727418-000, “Communications between Director Patel and Specific Individuals (February 16, 2026 – February 23, 2026),” (Ex. J).

35. Each of Defendant FBI’s letters, dated May 6, 7, and 8, 2026, summarily provided that, “You have not provided enough information concerning the statutory requirements for expedition; therefore, your request is denied.”

COUNT ONE
Unlawful Withholding of Agency Records

36. DDF reasserts and realleges all allegations set forth above as if each was set forth herein.

37. Defendant has, to date, failed to produce records responsive to Plaintiff’s FOIA Request or provide an explanation as to why responsive records cannot be produced because of exemptions outlined in 5 U.S.C. § 552(b).

38. Defendant’s failure to make a determination on Plaintiff’s FOIA Request or disclose the documents requested within the time frame mandated under FOIA is a denial and wrongful withholding of records in violation of 5 U.S.C. § 552.

39. Defendant’s conduct amounts to a denial of Plaintiff’s FOIA Request. Defendant is frustrating Plaintiff’s efforts to adequately understand Mr. Patel’s use of taxpayer funds and ability to fulfill his official duties as Director of the FBI.

40. Plaintiff has exhausted all applicable administrative remedies under 5 U.S.C. §552(a)(6)(C)(i).

COUNT TWO
Violation of Statutory Deadline

41. Plaintiff DDF reasserts and realleges all allegations set forth above as if each was set forth herein.

42. FOIA requires federal agencies to respond to public requests for records, including files maintained electronically, to increase public understanding of the workings of government and to provide access to government information. FOIA reflects a “profound national commitment to ensuring an open Government” and agencies must “adopt a presumption in favor of disclosure.” Presidential Mem., 74 Fed. Reg. 4683 (Jan. 21, 2009).

43. FOIA requires agencies to determine within 20 working days after the receipt of any FOIA request whether to comply with the request. 5 U.S.C. § 552(a)(6)(A)(i).

44. Agencies may only extend this time period for an additional 10 working days in “unusual circumstances.” 5 U.S.C. § 552(a)(6)(B)(i). FOIA also provides that upon request, agencies are to make records “promptly available.” 5 U.S.C. § 552(a)(3)(A).

45. More than three months have passed since Plaintiff submitted its FOIA Request on February 27, 2026, yet to date Defendant FBI has provided no documents in response to Plaintiff’s Request.

46. Administrative remedies are deemed exhausted when an agency fails to comply with the applicable time limits. 5 U.S.C. § 552(a)(6)(C)(i). Having exhausted its administrative remedies for its February 27, 2026, FOIA request, DDF now turns to this Court to enforce the remedies and public access to agency records guaranteed by FOIA.

RELIEF SOUGHT

WHEREFORE, Plaintiff respectfully requests that this Court:

58. Enter an order declaring that Defendant FBI unlawfully withheld records responsive to Plaintiff and violated the statutory deadline to respond to Plaintiff DDF's FOIA Request in violation of FOIA.

59. Order Defendant FBI to expeditiously and fully process Plaintiff's FOIA Request and disclose all non-exempt records and a Vaughn index to Plaintiff DDF;

60. Order Defendant FBI to agree to a production schedule;

61. Order Defendant FBI to preserve all records, in whatever form they exist, potentially responsive to DDF's pending FOIA Request prior to and during the processing of the Request;

62. Order Defendant FBI to grant DDF's request for a fee waiver;

63. Award Plaintiff attorney fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E);

64. Maintain jurisdiction over this action until Defendant FBI is in compliance with FOIA and every order of this Court; and

65. Grant such additional and further relief to which Plaintiff DDF may be entitled.

Dated: June 2, 2026

Respectfully submitted,

/s/ Ginger P. McCall

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