

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

LARRY KLAYMAN
7050 W. Palmetto Park Road
Boca Raton, FL, 33433

Plaintiff,

v.

CENTRAL INTELLIGENCE AGENCY
c/o Information and Privacy Coordinator
Washington, D.C., 20505

And

NATIONAL SECURITY AGENCY
9800 Savage Road, Suite 6932
Fort George G. Meade, MD 20755-6932

And

OFFICE OF THE DIRECTOR OF NATIONAL
INTELLIGENCE
Office of Strategic Communications
Washington, D.C. 20511

Defendants.

COMPLAINT

Plaintiff Larry Klayman (“Plaintiff”) brings this action against Defendants Central Intelligence Agency (“CIA”), National Security Agency (“NSA”) and Office of the Director of National Intelligence (“ODNI”) to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). As grounds therefore, Plaintiff alleges as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this action pursuant to 5. U.S.C. § 552(a)(4)(B) and 28 U.S.C 1331.

2. Venue is proper in this district pursuant to 28. U.S.C. 1391(e)

PARTIES

3. Plaintiff seeks to promote openness within the federal government and their actions. Plaintiff regularly requests records under FOIA to shed light on the operations of the federal government and to educate the public about these operations. Plaintiff then analyzes the agency records and disseminates the results of its analysis to the public.

4. Defendant CIA is an agency of the United States Government. Defendant CIA has possession, custody, and control of records to which Plaintiff seeks access.

5. Defendant NSA is an agency of the United States Government. Defendant CIA has possession, custody, and control of records to which Plaintiff seeks access.

6. Defendant ODNI is an agency of the United States Government. Defendant CIA has possession, custody, and control of records to which Plaintiff seeks access.

STATEMENT OF FACTS

7. On February 20, 2026, Plaintiff sent a FOIA request to Defendants by certified mail and email, seeking the production of agency records relating to Jeffrey Epstein. A true and correct copy of this request, which is attached hereto as Exhibit A, is incorporated herein by reference.

8. Specifically, Plaintiff requested the following documents:

Request #1 Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein.

Request #2 Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and the Central Intelligence Agency.

Request #3 Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and Israeli Mossad.

Request #4 Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and British MI-5 and MI-6.

Request #5 Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and to any domestic or foreign intelligence service and/or governmental agency.

Request #6 Any and all documents and records as defined and set forth above Which constitute, refer or relate to Prince Andrew Mountbatten- Windsor and Jeffrey Edward Epstein.

9. Defendants were required to determine whether to comply with Plaintiff's request within 20 days, excepting Saturdays, Sundays, and legal public holidays, pursuant to 5 U.S.C. § 552(a)(6)(A). Pursuant to this same provision, Defendants also were required to notify Plaintiff immediately of this determination, the reasons therefore, and the right to appeal any adverse determination to the head of the agency. Excluding weekends, and since there were no legal public holidays within the timeframe. Defendants were required to make its determination and provide Plaintiff with requisite notifications by March 23, 2026.

10. As of the date of this Complaint, Defendants CIA and NSA have failed to provide any response to Plaintiff's FOIA request.

11. Defendant ODNI has failed to make bona fide, good faith determinations about whether they will comply with Plaintiff's requests, and Defendant ODNI has not produced any records responsive to this request, indicated when any responsive records will be produced, or demonstrated that specific responsive records are exempt from production.

12. The attached FOIA requests, Defendants' failure to produce records, failure to say when any such records will be produced, and failure to grant expedited treatment and fee waivers demonstrates that any administrative appeal would be futile and thus the complaint is being filed as there is a widely recognized cover up underway. The subject of these FOIA requests is Jeffrey Epstein, who is believed to have been a so called intelligence asset of the United States, Israel and the United Kingdom. *See Singh v. Ashcroft*, 362 F.3d 1164, 1169 (9th Cir. 2004) (A plaintiff need

not “exhaust administrative remedies that would be futile” to exhaust.). *See also Sokha Sun v. Ashcroft*, 370 F.3d 932, 943 (9th Cir. 2004) (“where the agency’s position on the question at issue appears already set, and it is very likely what the result of recourse to administrative remedies would be, such recourse would be futile and is not required.”).

FIRST CAUSE OF ACTION
(Violation of FOIA, 5 U.S.C. § 552)

13. Plaintiff realleges paragraphs 1 through 12 as if fully stated herein.

14. Defendants are unlawfully withholding records requested by Plaintiff pursuant to 5 U.S.C. § 552.

15. Plaintiff is being irreparably harmed by reason of Defendant’s unlawful withholding of requested records, and Plaintiff will continue to be irreparably harmed unless Defendant is compelled to conform its conduct to the requirements of the law.

WHEREFORE, Plaintiff prays that the Court on an expeditious basis: (1) order Defendants to conduct a search for any and all responsive records to Plaintiff’s FOIA request and demonstrate that it employed search methods reasonably likely to lead to the discovery of records responsive to Plaintiff’s FOIA request; (2) order Defendants to produce under a fee waiver, by a certain date, any and all non-exempt records responsive to Plaintiff’s FOIA request and a *Vaughn* index of any responsive records withheld under claim of exception.; (3) enjoin Defendants from continuing to withhold any and all non-exempt records responsive to Plaintiff’s FOIA request; (4) grant Plaintiff an award of attorneys’ fees and other litigation costs reasonably incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E); and (5) grant Plaintiff such other relief as the Court deems just and proper.

Dated: April 13, 2026

Respectfully submitted,

/s/ Larry Klayman
Larry Klayman
7050 W. Palmetto Park Road

Boca Raton, FL, 33433
561-558-5336
Email: leklayman@gmail.com

Plaintiff Pro Se

EXHIBIT A



FREEDOM WATCH

▶ www.FreedomWatchUSA.org

▶ **World Headquarters** 2020 Pennsylvania Avenue, N.W., Suite 345, Washington, DC 20006-1811 ▶ (310) 595-0800 ▶ leklayman@gmail.com

February 20, 2026

Via U.S. Mail and Email

Central Intelligence Agency
Information and Privacy Coordinator
Washington, D.C., 20505

National Security Agency
Attn: FOIA/PA Office
9800 Savage Road, Suite 6932
Fort George G. Meade, MD 20755-6932

Director of National Intelligence
Louis DiNatale
Chief, Information Management Office
ATTN: FOIA/PA
Office of the Director of National Intelligence
Washington, D.C. 20511
ODNI_FOIA@odni.gov

Re: Freedom of Information Act Requests

Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and regulations promulgated thereunder, I hereby request from the Central Intelligence Agency, National Security Agency, and the Director of National Intelligence any and all documents that refer or relate in any way to the specific request set forth below.

I request expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I) and 28 C.F.R. § 16.5 (e) of the regulations governing the the requestees’ operations because time is of the essence in the events at issue for public knowledge of the nation's citizens.

I request that you provide the requested documents within ten (10) calendar days of receipt of this request.

FREEDOM OF INFORMATION REQUESTS

For the purpose of this Freedom of Information Act Request (“FOIA Request”), you must consider and comply with this request in good faith and in a timely matter. Please note

that a document that has been altered with the addition of handwritten notes or other information added is not the same document as the unaltered original.

Definitions

For the purpose of this FOIA request the term “document” is hereby defined expansively to include any or all of the following, whether existing as electronic, digital, or computer data, in electronic or digital form, or in paper form: correspondence, letters, memoranda, recommendations, records, orders, plans, proposals, meeting agendas, minutes of meetings, briefing materials, progress reports, weekly reports, talking points, briefing papers, requests for action, telephone logs, telephone message books, notes of phone messages or visits, routing slips, buck slips, standard government forms containing information filled in on lines or blank spaces, slide presentations, “card decks” (for presentations at meetings), power-point presentations, facsimiles (faxes), notes, handwritten notes, notes to the file, requests for decision, requests for authorization, tape recordings, video and/or audio recordings, electronic mail (email) messages, summaries, briefs, orders, written decisions, applications, photographs in hard copy or digital, and/or other documents and things. In addition, with regard to payments to persons or vendors, documents also include all invoices, bills, contracting records, commitment of funds, obligation of funds, or disbursement records.

For the purposes of this FOIA request, you are to search and produce any responsive documents or records that are within the Central Intelligence Agency, National Security Agency, and the Director of National Intelligence’s and their subdivisions’ and agencies’ possession, custody, or control regardless of who authored or created the document or record.

For the purposes of this FOIA request, the term "communication" includes any form of communication, such as by letter, by facsimile, by note, by telephone text message, by electronic mail (email), computer messaging service, or by any other means.

The time period for records that we request is records created on or after January 1, 2000.

Requests

- | | |
|------------|--|
| Request #1 | Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein. |
| Request #2 | Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and the Central Intelligence Agency. |
| Request #3 | Any and all documents and records as defined and set forth above that refer or relate to Jeffrey Edward Epstein and Israeli Mossad. |

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- Request #6 Any and all documents and records as defined and set forth above Which constitute, refer or relate to Prince Andrew Mountbatten-Windsor and Jeffrey Edward Epstein.

LEGAL GUIDELINES

In accordance with FOIA and its regulations, policies and precedents directing that the FOIA focuses on information, not only documents and records, we request maximum disclosure of information and documents, including any segregable portions of documents if some portions are withheld due to a claim of privilege or exemption.

If any documents are withheld subject to any claim of privilege or exemption, we request complete information about each document withheld, including which paragraph of the request to which the document is responsive; the date, author and title of the document; an explanation of the applicability of the claimed exemption to the contents of the document; and the name and title of each person responsible for the denial. This is commonly known as a Vaughan Index.

Furthermore, as to any claim that documents will be withheld on the basis of any deliberative process privilege we draw your attention to the legal requirements that the deliberative process exemption does not permit withholding of --

- (a) facts which are segregable from deliberations
- (b) opinions about such facts which merely convey or further describe factual information;
- (c) any deliberations unrelated to any actual decision;
- (d) any deliberations in areas where there are allegations of governmental misconduct, and
- (e) deliberations, opinions, or recommendations that are incorporated into a final decision and/or which serve to explain a final decision by the government.

We therefore demand production of all documents and records and in unredacted form notwithstanding any possible claim of the deliberative process exemption or any other claimed exemption.

REQUEST FOR EXPEDITED PROCESSING

I hereby request expedited processing of this request pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I), as there is a compelling need for this information and time is truly of the essence in this matter. *See Open America v. Watergate Special Prosecution Force*, 547 F.2d 605, 614-16 (D.C. Cir. 1976) (holding that requests that involved a far greater degree of urgency than others should be processed out of turn). *See also Mills v. District of Columbia*, 571 F.3d 1304 (D.C. Cir. 2009). Damage caused by the illegal actions of Jeffrey Edward Epstein to the victims and survivors of his illegal conduct as well as the public, is presumed when the Constitution is violated. "It has long been established that the loss of constitutional freedoms, `for even minimal periods of time, unquestionably constitutes irreparable injury.'" *Id.* at 1312. Even one day of constitutional injury constitutes irreparable injury.

Pursuant to 5 U.S.C. § 552(a)(6)(E)(ii)(I) the foregoing is true and correct to the best of my knowledge and belief.

REQUEST FOR FEE WAIVER

I also respectfully request a blanket fee waiver on behalf of the public interest, to which it is entitled under 5 U.S.C. § 552(a)(4)(A); *see also, Larson v. Central Intelligence Agency*, 843 F.2d 1482, 1483 (D.C. Cir. 1988); *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989); *see also, Judicial Watch, Inc. v. United States Dep't. of Commerce*, No. 95-0133 (D.D.C. May 16, 1995) (order granting Judicial Watch USA, Inc.'s request for fee waiver with regard to all responsive documents in proceeding).

I have no commercial purpose. The requester will also use the requested material to promote accountable government as a representative of the news media and the public in accordance with 5 U.S.C. § 552(a)(4)(A)(ii)(II) and *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989), by disseminating relevant information which may be uncovered. Information will benefit the public by identifying areas for future reform as well as deterring future abuses that could otherwise proliferate without scrutiny. The subject of this request is information concerning the operations and activities of the government.

Your prompt attention and full compliance is not just requested, but is mandatory under the extreme circumstances of this matter.

Sincerely,



Larry Klayman

<input type="radio"/> G. Habeas Corpus/ 2255 530 Habeas Corpus – General 510 Motion/Vacate Sentence 463 Habeas Corpus – Alien Detainee	<input type="radio"/> H. Employment Discrimination 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation) *(If pro se, select this deck)*	<input type="radio"/> I. FOIA/Privacy Act 895 Freedom of Information Act 890 Other Statutory Actions (if Privacy Act) *(If pro se, select this deck)*	<input type="radio"/> J. Student Loan 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> K. Labor/ERISA (non-employment) 710 Fair Labor Standards Act 720 Labor/Mgmt. Relations 740 Labor Railway Act 751 Family and Medical Leave Act 790 Other Labor Litigation 791 Empl. Ret. Inc. Security Act	<input type="radio"/> L. Other Civil Rights (non-employment) 441 Voting (if not Voting Rights Act) 443 Housing/Accommodations 440 Other Civil Rights 445 Americans w/Disabilities – Employment 446 Americans w/Disabilities – Other 448 Education	<input type="radio"/> M. Contract 110 Insurance 120 Marine 130 Miller Act 140 Negotiable Instrument 150 Recovery of Overpayment & Enforcement of Judgment 153 Recovery of Overpayment of Veteran’s Benefits 160 Stockholder’s Suits 190 Other Contracts 195 Contract Product Liability 196 Franchise	<input type="radio"/> N. Three-Judge Court 441 Civil Rights – Voting (if Voting Rights Act)

V. ORIGIN
 1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multi-district Litigation
 7 Appeal to District Judge from Mag. Judge
 8 Multi-district Litigation – Direct File

VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)

VII. REQUESTED IN COMPLAINT	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$ _____	JURY DEMAND: YES <input type="checkbox"/> NO <input type="checkbox"/>
VIII. RELATED CASE(S) IF ANY	(See instruction)	YES <input type="checkbox"/> NO <input type="checkbox"/>	If yes, please complete related case form

DATE: _____ SIGNATURE OF ATTORNEY OF RECORD _____

INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44
Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil coversheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States.
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk’s Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*: _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Civil Action No. _____

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Other *(specify)*: _____.

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