

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

PUBLIC EMPLOYEES FOR  
ENVIRONMENTAL RESPONSIBILITY,  
962 Wayne Ave., Suite 610  
Silver Spring, MD 20910

*Plaintiff,*

v.

U.S. DEPARTMENT OF THE INTERIOR  
1849 C St. NW,  
Washington, DC 20240

*Defendant.*

CIVIL ACTION NO. 26-cv-1611

**COMPLAINT**

**PRELIMINARY STATEMENT**

1. Public Employees for Environmental Responsibility (“Plaintiff” or “PEER”) brings this action under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, *et seq.*, as amended, to compel the United States Department of the Interior (“DOI”) to disclose records that PEER requested pursuant to FOIA that are now over two months overdue for a determination of whether to comply with the request and the reasons therefore. DOI has neither made a final determination nor produced any records responsive to this request.
2. On February 25, 2026, PEER submitted three FOIA requests for information and communications from DOI regarding the funding of Freedom 250 and other related matters. This matter is urgent, given the approaching celebration in July of this year of the 250<sup>th</sup> anniversary of the founding of our nation and public interest in these events. To date, Defendant has failed to make a final determination on any of PEER’s FOIA requests and has failed to disclose any of the requested records within the time stipulated under FOIA.

### **JURISDICTION AND VENUE**

3. This Court has jurisdiction over this action under 5 U.S.C. § 552(a)(4)(B). This Court also has federal question jurisdiction over this action under 28 U.S.C. § 1331.
4. This Court has the authority to grant declaratory relief pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*
5. This Court is a proper venue under 5 U.S.C. § 552(a)(4)(B) (providing for venue in FOIA cases where the plaintiff resides, or in the District of Columbia).
6. This Court has the authority to award reasonable costs and attorneys' fees under 5 U.S.C. § 552(a)(4)(E).

### **PARTIES**

7. Plaintiff is a non-profit public interest organization incorporated in Washington, D.C., and headquartered in Silver Spring, Maryland.
8. Among other public interest projects, PEER engages in advocacy, research, education, and litigation relating to the promotion of public understanding and debate concerning key current public policy issues. PEER focuses on the environment, including public lands and natural resource management, the regulation and remediation of toxic substances, public funding of environmental and natural resource agencies, and government accountability. Therefore, PEER has an institutional investment in the conduct of DOI, how its congressionally appropriated funding is used, including tasks DOI employees are assigned to or diverted from. PEER educates and informs the public through news releases to the media, through its web site, [www.peer.org](http://www.peer.org), and through publication of the *PEER*review newsletter.
9. Defendant DOI is an agency of the United States as defined by 5 U.S.C. § 552(f)(1).
10. DOI is charged with the duty to provide public access to records in its possession consistent

with the requirements of FOIA. The failure of DOI to provide PEER with the records requested and its failure to make a final determination on PEER's FOIA request within twenty working days are violations of FOIA.

### **STATEMENT OF FACTS**

11. On February 25, 2026, PEER submitted three FOIA requests to the Department of the Interior. Specifically, PEER submitted identical requests to the National Park Service (NPS) ("NPS Request"), a bureau of DOI, the DOI Office of the Secretary (DOI OS)("OS Request"), and the DOI Office of the Solicitor (DOI SOL)("SOL Request"). These requests sought records for the time frame January 20, 2025 through the date the search is initiated and included request-specific lists of potential custodians at NPS, DOI OS, and DOI SOL.
12. More specifically, the FOIA request submitted to NPS sought the following documents:
  - a. Documents reflecting the request (referenced by Jeff Reinbold in the above-referenced congressional testimony) made by the National Park Service (or Department of the Interior) to the NPF [National Park Foundation], along with any subsequent agreements or memoranda of understanding (MOU), to hold Semiquincentennial funds.
  - b. All MOUs, agreements, or similar documents between NPF or any subsidiary (including Freedom250 or Freedom250 LLC) and the NPS or DOI governing the acceptance or administration of money or other activities related to Semiquincentennial activities, including Freedom250 or Freedom250 LLC.
  - c. All documents reflecting requests made by NPS (or Department of the Interior) to NPF in relation to Freedom250 or Freedom250 LLC, the National Garden of American Heroes, White House renovations, the proposed Freedom250 Grand Prix,

or the proposed Independence Arch.

- d. All internal donor vetting requests, including those sent to the Office of the Solicitor, for potential donors to Freedom250 or Freedom250 LLC.
- e. Documents sufficient to demonstrate all changes made to NPS donations policy (generally Director's Order 21 and implementing policy) since January 20, 2025.
- f. The grant agreement for Federal Agreement Identification Number P26AC00101 from NPS to NPF for "A250 Events" and documents related to the decision to issue such grant to the NPF ([https://www.usaspending.gov/award/ASST\\_NON\\_P26AC00101\\_014](https://www.usaspending.gov/award/ASST_NON_P26AC00101_014)).
- g. All communications (including emails, letters, etc.) between any representative or employee of Freedom250 or Freedom250 LLC (including, but not limited to, Keith Krach, Meredith O'Rourke, Danielle Alvarez, Rachel Gerli, and Danielle Madda) and any employee of the NPS, including any attachments or exhibits to such communications.

...

13. The FOIA request submitted to DOI OS sought the following documents:

- a. Documents reflecting the request (referenced by Jeff Reinbold in the above-referenced congressional testimony) made by the National Park Service (or Department of the Interior) to the NPF, along with any subsequent agreements or memoranda of understanding (MOU), to hold Semiquincentennial funds.
- b. All MOUs, agreements, or similar documents between NPF or any subsidiary (including Freedom250 or Freedom250 LLC) and the NPS or DOI governing the

acceptance or administration of money or other activities related to

Semiquincentennial activities, including Freedom250 or Freedom250 LLC.

- c. All documents reflecting requests made by NPS (or Department of the Interior) to NPF in relation to Freedom250 or Freedom250 LLC, the National Garden of American Heroes, White House renovations, the proposed Freedom250 Grand Prix, or the proposed Independence Arch.
- d. All internal donor vetting requests, including those sent to the Office of the Solicitor, for potential donors to Freedom250 or Freedom250 LLC.
- e. Documents sufficient to demonstrate all changes made to NPS donations policy (generally Director's Order 21 and implementing policy) since January 20, 2025.
- f. The grant agreement for Federal Agreement Identification Number P26AC00101 from NPS to NPF for "A250 Events" and documents related to the decision to issue such grant to the NPF ([https://www.usaspending.gov/award/ASST\\_NON\\_P26AC00101\\_014](https://www.usaspending.gov/award/ASST_NON_P26AC00101_014)).
- g. All communications (including emails, letters, etc.) between any representative or employee of Freedom250 or Freedom250 LLC (including, but not limited to, Keith Krach, Meredith O'Rourke, Danielle Alvarez, Rachel Gerli, and Danielle Madda) and any employee of the Office of the Secretary, including any attachments or exhibits to such communications.

...

14. The FOIA request submitted to DOI SOL sought the following documents:

- a. Documents reflecting the request (referenced by Jeff Reinbold in the above-referenced congressional testimony) made by the National Park Service (or

Department of the Interior) to the NPF, along with any subsequent agreements or memoranda of understanding (MOU), to hold Semiquincentennial funds.

- b. All MOUs, agreements, or similar documents between NPF or any subsidiary (including Freedom250 or Freedom250 LLC) and the NPS or DOI governing the acceptance or administration of money or other activities related to Semiquincentennial activities, including Freedom250.
- c. All documents reflecting requests made by NPS (or Department of the Interior) to NPF in relation to Freedom250 or Freedom250 LLC, the National Garden of American Heroes, White House renovations, the proposed Freedom250 Grand Prix, or the proposed Independence Arch.
- d. All internal donor vetting requests, including those sent to the Office of the Solicitor, for potential donors to Freedom250 or Freedom250 LLC.
- e. Documents sufficient to demonstrate all changes made to NPS donations policy (generally Director's Order 21 and implementing policy) since January 20, 2025.
- f. The grant agreement for Federal Agreement Identification Number P26AC00101 from NPS to NPF for "A250 Events" and documents related to the decision to issue such grant to the NPF ([https://www.usaspending.gov/award/ASST\\_NON\\_P26AC00101\\_014](https://www.usaspending.gov/award/ASST_NON_P26AC00101_014)).
- g. All communications (including emails, letters, etc.) between any representative or employee of Freedom250 or Freedom250 LLC (including, but not limited to, Keith Krach, Meredith O'Rourke, Danielle Alvarez, Rachel Gerli, and Danielle Madda) and any employee of the Office of the Solicitor, including any attachments or exhibits to such communications.

...

15. To date, PEER has not received one page of production from DOI OS, DOI SOL, or NPS.

**1. Request to DOI Office of the Secretary (OS Request) – FOIA No. 2026-004181.**

16. On March 9, 2026, the DOI Office of the Secretary, via email and letter of acknowledgment from the DOI OS Government Information Specialist to PEER, acknowledged receipt of the request and assigned the request tracking number DOI-2026-004181.

17. The letter of acknowledgement granted PEER's fee waiver request and placed the request on the "Complex" processing request. DOI OS stated that such requests generally take "twenty-one to sixty workdays to process." DOI OS also took a "10-workday extension" pursuant to 5 U.S.C. § 552(a)(6)(B)(i) and 43 C.F.R. 2.19.

18. On March 26, 2026, PEER sent an email to DOI OS, asking for an update regarding production of records, and stating that we are amenable to rolling production.

19. On May 1, PEER sent a follow-up email to DOI OS (after receiving no response to the March 26, 2026 email) asking the agency to confirm whether it will provide interim production, and, if so, to share a schedule. On May 11, 2026, PEER received a response from DOI OS, stating it anticipated an initial release in June.

20. To date, PEER has not received a final determination or any records related to this request.

**2. Request to DOI Office of the Solicitor (SOL Request) – FOIA No. 2026-004180**

21. On March 5, 2026, the DOI Office of the Solicitor sent an email and letter of acknowledgment to PEER acknowledging receipt of the request and assigning the request tracking number DOI-2026-004180.

22. The letter of acknowledgement, signed by the DOI SOL FOIA Officer, did not address PEER's fee waiver request. DOI SOL classified PEER as an "other" requester. PEER has asked for

clarification on our fee waiver request and has not received a clear response to date. DOI SOL also placed the request on the “Extraordinary” track for processing our request. DOI SOL stated that such requests generally take “more than sixty workdays to process.” DOI SOL also stated that there is “1 request pending ahead of yours in this processing track.”

23. On March 26, 2026, PEER received an email from DOI SOL, stating they will begin their review and “make partial productions in order to get a response to you as soon as we can.” On April 30, 2026, DOI SOL stated that the search had been completed and they had begun their review. DOI SOL stated there “are over 1,600 potentially responsive documents, so we will certainly do rolling releases as we proceed through our review.”

24. On May 1, PEER sent a follow-up email to DOI SOL asking the agency to share an estimated date for providing a first rolling production, and a clear answer on PEER’s fee waiver request.

25. To date, PEER has not received a final determination or any records related to this request.

### **3. Request to National Park Service (NPS Request) – FOIA No. 2026-004178**

26. On March 5, 2026, the National Park Service, through an NPS Records and Information Management Specialist, sent an email and letter of acknowledgment to PEER acknowledging receipt of the request and assigning the request tracking number DOI-2026-004178.

27. The letter of acknowledgement did not address PEER’s fee waiver request, because NPS stated “[a]t this time, we do not foresee a billable fee for the processing of this request and there is no need for us to address your request for a fee waiver.” NPS stated that PEER’s request falls into the “Complex” processing track, and that there are 53 requests before ours. NPS also stated “[a]s yet, we have been unable to make a determination on your request. We apologize for this delay.”

28. On April 28, 2026, PEER sent an email to NPS FOIA staff, asking for an update and an

estimate of initial production. On April 29, 2026, NPS FOIA staff responded that “we have not reached a final decision on whether responsive material is exempt from release.” NPS also stated that there are 37 requests in the “complex” queue ahead of PEER’s request. NPS estimated starting to make a rolling production around August 3, 2026, and also identified approximately 9,000 pages as potentially responsive to our request. NPS said they expected to invoke Exemption 5 and Exemption 6, and added “We apologize for this delay in completing our decision.”

29. To date, PEER has not received a final determination or any records related to this request.

### **CAUSE OF ACTION**

30. Plaintiff incorporates the allegations in the preceding paragraphs as though fully set forth herein.

31. 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).

32. FOIA requires agencies to determine within twenty working days after the receipt of any FOIA request whether to comply with the request. 5 U.S.C. § 552(a)(6)(A)(i). Agencies may only extend this time period for an additional ten 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).

33. Twenty working days from PEER’s requests was March 25, 2026.

34. NPS’s expected date of completing this FOIA request, August 3, 2026, is well past the

timeframe permissible under FOIA. Neither DOI SOL or DOI OS has provided an estimate of a date when they would first produce documents.

35. As of the date of this filing, PEER has not received a final determination on its FOIA request and neither NPS, DOI SOL, or DOI OS has made the records “promptly available.” NPS and DOI’s response to the FOIA request described above is now overdue for a final determination and “prompt” release of the records.

36. 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 the FOIA request described in this complaint, PEER now turns to this Court to enforce the remedies and public access to agency records guaranteed by FOIA.

37. Defendant’s conduct amounts to a denial of PEER’s FOIA request. NPS and DOI are frustrating PEER’s efforts to adequately understand NPS and DOI’s policy regarding the funding of the America 250 celebration this summer, and the potentially improper or illegal role of Freedom 250 and its funding structure. Because these celebrations are due to occur in July of this year, NPS and DOI’s failure to abide by FOIA’s requirements is particularly obstructive to the purposes of FOIA.

38. Plaintiff has constructively exhausted its administrative remedies under 5 U.S.C. § 552(a)(6)(C)(i), and now seeks an order from this Court requiring DOI and NPS to immediately make a determination and produce the records sought in PEER’s FOIA request, as well as other appropriate relief, including attorneys’ fees and costs.

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

**RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests that this Court:

- i. Enter an order declaring that Defendant wrongfully withheld requested agency documents;
- ii. Issue a permanent injunction directing Defendant to disclose to Plaintiff all wrongfully withheld documents;
- iii. Maintain jurisdiction over this action until Defendant is in compliance with the FOIA and every order of this Court;
- iv. Award Plaintiff attorneys' fees and costs pursuant to 5 U.S.C. § 552(a)(4)(E); and
- v. Grant such additional and further relief to which Plaintiff may be entitled.

Respectfully submitted on May 11, 2026,

*/s/ Colleen Zimmerman*

Colleen Zimmerman, DC Bar #90003410

Paula Dinerstein, DC Bar # 333971

Public Employees for Environmental  
Responsibility

962 Wayne Ave, Suite 610

Silver Spring, MD 20910

202-464-2293

301-580-4020

[czimmerman@peer.org](mailto:czimmerman@peer.org)

[pdinerstein@peer.org](mailto:pdinerstein@peer.org)

*Attorney for Plaintiff*



<input type="radio"/> <b>G. Habeas Corpus/ 2255</b>  <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> <b>H. Employment Discrimination</b>  <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation)  *(If pro se, select this deck)*	<input checked="" type="radio"/> <b>I. FOIA/Privacy Act</b>  <input checked="" type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (if Privacy Act)  *(If pro se, select this deck)*	<input type="radio"/> <b>J. Student Loan</b>  <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> <b>K. Labor/ERISA (non-employment)</b>  <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> <b>L. Other Civil Rights (non-employment)</b>  <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> <b>M. Contract</b>  <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran’s Benefits <input type="checkbox"/> 160 Stockholder’s Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> <b>N. Three-Judge Court</b>  <input type="checkbox"/> 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.)**  
 5 U.S.C. 552: 43 C.F.R. 2.1 et seq. Constructive denial and wrongful withholding of records under FOIA.

<b>VII. REQUESTED IN COMPLAINT</b>	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 checked="" type="checkbox"/>
<b>VIII. RELATED CASE(S) IF ANY</b>	(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form

DATE: May 11, 2026	SIGNATURE OF ATTORNEY OF RECORD: _____/s/Colleen Zimmerman
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**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 cover sheet. 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.

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

Public Employees for Evt'l Responsibility

*Plaintiff*

v.

Department of the Interior

*Defendant*

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Civil Action No. **26-1611**

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)* Department of the Interior, Office of the Secretary  
1849 C St. NW,  
Washington, DC 20240

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Colleen Zimmerman, DC Bar # 90003410  
Paula Dinerstein, DC Bar# 333971  
Public Employees for Environmental Responsibility  
962 Wayne Ave, Suite 610  
Silver Spring, MD 20910

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*ANGELA D. CAESAR, CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. 26-1611

**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 \$ \_\_\_\_\_ 0.00.

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:

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

Public Employees for Evt'l Responsibility

\_\_\_\_\_  
*Plaintiff*

v.

Department of the Interior

\_\_\_\_\_  
*Defendant*

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Civil Action No. 26-1611

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

US Attorney General  
950 Pennsylvania Ave, NW  
Washington, DC 20530

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Colleen Zimmerman, DC Bar # 90003410  
Paula Dinerstein, DC Bar# 333971  
Public Employees for Environmental Responsibility  
962 Wayne Ave, Suite 610  
Silver Spring, MD 20910

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*ANGELA D. CAESAR, CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. 26-1611

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\_\_\_\_\_, 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

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Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

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

Public Employees for Evt'l Responsibility

*Plaintiff*

v.

Department of the Interior

*Defendant*

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Civil Action No. **26-1611**

**SUMMONS IN A CIVIL ACTION**

To: *(Defendant's name and address)*

US Attorney for the District of Columbia  
555 Fourth Street, NW  
Washington, DC 20530

A lawsuit has been filed against you.

Within 30 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Colleen Zimmerman, DC Bar # 90003410  
Paula Dinerstein, Bar# 333971  
Public Employees for Environmental Responsibility  
962 Wayne Ave, Suite 610  
Silver Spring, MD 20910

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

*ANGELA D. CAESAR, CLERK OF COURT*

Date: \_\_\_\_\_

\_\_\_\_\_  
*Signature of Clerk or Deputy Clerk*

Civil Action No. 26-1611

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\_\_\_\_\_, 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 \$ \_\_\_\_\_ 0.00 \_\_\_\_\_.

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: