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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

AMERICAN ATHEISTS,
225 Cristiani St.
Cranford, NJ 07016,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE,
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001,

U.S. DEPARTMENT OF THE INTERIOR,
1849 C St., NW, MS-4106
Washington, DC 20240,

Defendants.

Civil Action No.
_____

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. This Freedom of Information Act ("FOIA") lawsuit seeks the release of records in the possession of the U.S. Department of Justice ("DOJ") and the U.S. Department of the Interior ("DOI", collectively, the "Government") pertaining to the DOI's organization of, and DOJ's promotion of, "Rededicate 250" ("Event") an event held on the National Mall on Sunday, May 17, 2026, "to worship, pray, and rededicate America as One Nation Under God." DOJ promoted the event to both its own employees and the general public, including all those who registered to attend hearings of the Religious Liberty Commission.

2. The Event was organized by Freedom 250, LLC, a public-private partnership arising from Executive Order 14189, signed by President Trump on January 29, 2025, and existing within the DOI.

3. The Event was expressly religious in nature and included, among other things, a Christian opening worship service, proselytizing speeches from evangelical Christian government employees, elected

officials, and supporters of the Trump Administration, and a Christian worship concert.

4. On May 8, 2026, the DOJ sent an email from the RLC@usdoj.gov email account to its mailing list of those who attended, or registered to attend, one or more hearings of the Religious Liberty Commission.

5. American Atheists, a national 501(c)(3) nonprofit corporation dedicated to preserving the separation between religion and government and eliminating discrimination against the atheist community, has serious concerns about the legality of the event, the process by which it was organized, and the manner in which it was promoted.

6. On May 11, 2026, American Atheists submitted records requests to the DOJ and DOI, seeking specific correspondence regarding the Event, Freedom 250, and Rededicate 250.

7. Neither the DOJ nor the DOI have produced a single record in response to American Atheists' requests.

8. Plaintiff American Atheists brings this action seeking

declaratory, injunctive, and other appropriate relief against Defendants U.S. Department of Justice and U.S. Department of the Interior to compel compliance with the Freedom of Information Act, 5 U.S.C. § 552.

JURISDICTION AND VENUE

9. This Court has subject-matter and personal jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B), 28 U.S.C. § 1331, and 5 U.S.C. §§ 701–706.

10. Venue lies in this district under 5 U.S.C. § 552(a)(4)(B).

PARTIES

11. Plaintiff American Atheists is a 501(c)(3) nonprofit organization incorporated in the State of New Jersey.

12. Defendant U.S. Department of Justice is an agency of the executive branch of the United States government and is an agency within the meaning of 5 U.S.C. § 552(f)(1).

13. Defendant U.S. Department of the Interior is an agency of the

executive branch of the United States government and is an agency within the meaning of 5 U.S.C. § 552(f)(1).

STATEMENT OF FACTS

American Atheists' FOIA Requests and the Government's Response

Department of Justice

14. On May 11, 2026, American Atheists submitted to the DOJ three separate sets of FOIA requests (collectively "DOJ Requests") for records concerning the Event, Freedom 250, and Rededicate 250. These requests sought the same classes of records from three different offices within the DOJ: the Office of the Attorney General, the Office of the Deputy Attorney General, and the Office of the Associate Attorney General.

15. The DOJ initially designated these as Requests ## FOIA-2026-03103, FOIA-2026-03104, FOIA-2026-03105. Requests ## FOIA-2026-03104 and FOIA-2026-03105 were administratively merged into Request # FOIA-2026-03103.

16. These requests sought:

a) All emails sent or received after January 1, 2026 containing any of the following terms, regardless of capitalization:

"rededicate 250,"

"rededicate250,"

"freedom 250,"

"freedom250,"

"freedom250.org;"

b) All emails sent to or received from Rededicate250@WHO.eop.gov after January 1, 2026; and

c) All emails sent or received after January 1, 2025 containing "Rededicate250@WHO.eop.gov."

17. On May 11, 2026, the DOJ acknowledged receipt of the requests.

18. On May 13, 2026, the DOJ sent American Atheists a letter stating that Requests ## FOIA-2026-03104 and FOIA-2026-03105 were administratively merged into Request # FOIA-2026-03103, extending the

time to respond by ten days, and assigning the DOJ Requests to the "complex track."

19. American Atheists has received no further response or correspondence from the DOJ regarding the DOJ Requests.

20. As of the date of this filing, the DOJ has not released any records in response to the DOJ Requests.

Department of the Interior

21. On May 11, 2026, American Atheists submitted to the DOI a FOIA request ("DOI Request") for records concerning the Event, Freedom 250, and Rededicate 250.

22. The DOI designated these as Request # DOI-2026-006144.

23. This request sought:

a) All NPS Form 10-941s for events with a "Primary Date" or "Alternate Date" of May 17, 2026;

b) All emails sent or received after January 1, 2026 containing any of the following terms, regardless of

capitalization:

"rededicate 250,"

"rededicate250,"

"freedom 250,"

"freedom250,"

"freedom250.org;"

c) All emails sent to or received from Rededicate250@WHO.eop.gov after January 1, 2026; and

d) All emails sent or received after January 1, 2025 containing "Rededicate250@WHO.eop.gov."

24. On May 11, 2026, the DOI acknowledged receipt of the requests.

25. American Atheists has received no further response or correspondence from the DOI regarding the DOI Request.

26. As of the date of this filing, the DOI has not released any records in response to the DOI Request.

CLAIMS FOR RELIEF

COUNT ONE
Against both Defendants
Freedom of Information Act, 5 U.S.C. § 552
(Failure to Respond)

27. Plaintiff re-alleges and incorporates by reference all allegations in the foregoing paragraphs as if fully set forth herein.

28. The failure of the DOJ and DOI to timely respond to the Requests violates FOIA, 5 U.S.C. § 552(a)(6)(A) and (B), and their respective corresponding regulations.

29. The DOJ and DOI have no legal justification for failing to produce responsive records within the time allowed by the FOIA.

30. Plaintiff is therefore entitled to injunctive and declaratory relief requiring the Department of Justice and the Department of the Interior to produce the requested records to Plaintiff.

COUNT TWO
Against both Defendants
Freedom of Information Act, 5 U.S.C. § 552
(Failure to Conduct a Reasonable Search)

31. Plaintiff re-alleges and incorporates by reference all allegations in the foregoing paragraphs as if fully set forth herein.

32. The DOJ and DOI's failure to conduct a reasonable search for records sought by the Requests violates FOIA, 5 U.S.C. § 552(a)(3), and their respective corresponding regulations.

33. The DOJ and DOI failed to search the appropriate offices and failed to request records from their officials likely to possess responsive records.

34. The DOJ and DOI have no legal justification for failing to conduct a reasonable search for responsive records within the time allowed by the FOIA.

35. Plaintiff is therefore entitled to injunctive and declaratory relief requiring the Department of Justice and the Department of the Interior to produce the requested records to Plaintiff.

COUNT THREE
Against both Defendants
Freedom of Information Act, 5 U.S.C. § 552
(Wrongful Withholding of Records)

36. Plaintiff re-alleges and incorporates by reference all allegations in the foregoing paragraphs as if fully set forth herein.

37. The DOJ and DOI are wrongfully withholding records by failing to produce non-exempt records responsive to Plaintiff's Requests and failing to segregate (or redact) exempt materials and produce non-exempt records responsive to Plaintiff's DOJ Requests and DOI Request.

38. The failure of the DOJ and DOI to promptly make available the records sought by the Requests violates FOIA, 5 U.S.C. § 552(a)(3)(A), and their respective corresponding regulations.

39. The DOJ and DOI have no legal justification for withholding nonexempt material in responsive records as required by the FOIA.

40. Plaintiff is therefore entitled to injunctive and declaratory relief requiring the Department of Justice and the Department of the Interior to produce the requested records to Plaintiff.

REQUESTED RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

A. Order the Department of Justice and the Department of the Interior to conduct a reasonable search for, and produce, all records responsive to the Requests within 20 days of the Court's Order, or by such other date as the Court deems appropriate;

B. Declare unlawful the failure of the Department of Justice and the Department of the Interior to respond as required by the FOIA and enjoin them both from continuing to withhold records responsive to the Requests;

C. Award Plaintiff its costs and reasonable attorney fees incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E) and/or 28 U.S.C. § 2412(d)(1)(A); and

D. Grant such other relief as the Court may deem just and proper.

Dated: October 29, 2026
Philadelphia, Pennsylvania

Respectfully Submitted,

/s/ Geoffrey T. Blackwell
Geoffrey T. Blackwell, Esq.
NJ# 120332014