UNITED STATES DISTRICT COURT

(*enter name of district)* DISTRICT OF (*enter name of state*)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

(*enter your name*),

Plaintiff,

v.

(*enter name of agency you are suing*),

Defendant.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Complaint**

1. This is an action under the Freedom of Information Act (FOIA), 5 USC §552, for injunctive and other appropriate relief and seeking the disclosure and release of agency records pertaining to Plaintiff, (*enter your name*), improperly withheld from him by (enter name of *agency*).

**Jurisdiction and Venue**

2. This Court has both subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 USC §552 (a) (4) (B). This Court also has jurisdiction over this action pursuant to 28 USC §1331. Venue lies in the district under 5 USC §552 (a) (4) (B).

**Parties**

3. Plaintiff is a resident of (*insert city and state*).

4. Defendant (*enter name of agency*) is a Department of the Executive Branch of the United States Government, and includes the (*enter name of agency*). The (*enter name of agency*) is an agency within the meaning of 5 USC §552 (f).

**Facts**

5. By letter dated (*enter date*), addressed to (*enter the name of agency*), Plaintiff, requested copies of all records pertaining to him/herself.

6. By letter dated (*enter date*), (*enter name, title and name of agency*), advised Plaintiff that his/her FOIA request had been received and that it had been assigned Number (*enter number*).

7. By letter dated (*enter date*), addressed to (*enter name of agency*), Plaintiff treated the failure on the part of (*enter name of agency*) to produce the sought-after records within the time parameters set forth in 5 USC §552 as a denial and filed an administrative appeal.

8. By letter dated (*enter date*), (*enter name, title and name of agency*), advised Plaintiff that his/her administrative appeal dated (*enter date*) had been received on (*enter date*) and that it had been assigned number (*enter number*).

9. By letter dated (*enter date*), (*enter name, title, and name of agency*), informed Plaintiff that (*insert details*).

10. ***(*NOTE:** ***Use this paragraph only if the agency did not comply with your FOIA request and/or appeal within 20 working days)***. More than 20 days have passed since the (*enter name of the agency*) received Plaintiff’s FOIA request, and it has not notified Plaintiff as to whether it will fully comply with his/her request. Thus, under 5 USC §552 (a) (6) (A) and 5 USC §552 (a) (6) (C), Plaintiff has exhausted the applicable administrative remedies with respect to his/her FOIA request.

11. Plaintiff has a right of prompt access to the requested records under 5 USC §552 (a) (3) (A) and the (*name of agency*) has wrongfully withheld the sought-after documents.

**Requested Relief**

Wherefore, Plaintiff prays that this Court:

1. order Defendant to disclose the requested records in their entireties and make copies available to Plaintiff;

2. provide for expeditious proceedings in this action;

3. award Plaintiff his/her costs and reasonable attorneys fees incurred in this action; and

4. grant such other relief as the Court may deem just and proper.

Dated: (*date*)

Respectfully submitted,

*s/your name*

Your Name, Pro Se

Address

City, State, Zip Code

Phone number

Email address