

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

**PATRICK EDDINGTON,** )  
1000 Massachusetts Avenue )  
Washington, DC 20001 )

**Plaintiff,** )

**v.** )

**FEDERAL BUREAU OF** )  
**INVESTIGATION,** )  
935 Pennsylvania Avenue, NW )  
Washington, D.C. 20535 )

**U.S. DEPARTMENT OF JUSTICE,** )  
950 Pennsylvania Avenue, NW )  
Washington, D.C. 20530 )

**Defendants.** )

**COMPLAINT**

1. Plaintiff, PATRICK EDDINGTON files this Freedom of Information Act suit to force Defendants FEDERAL BUREAU OF INVESTIGATION and DEPARTMENT OF JUSTICE, to produce records that were previously produced to requester Assia Boundaoui regarding Operation VULGAR BETRAYAL. For decades, the FBI kept a close eye on mosques, schools, and community meetings in Bridgeview, Illinois in the Operation VULGAR BETRAYAL. Those records have already been produced in Ms. Boundaoui’s FOIA suit, but Defendants have failed to provide them to Plaintiff here for over six months.

**PARTIES**

2. Plaintiff PATRICK EDDINGTON is a policy analyst and scholar at the Cato Institute and made the FOIA request at issue in this case.

3. Defendant FEDERAL BUREAU OF INVESTIGATION (“FBI”) is a federal agency subject to the Freedom of Information Act, 5 U.S.C. § 552, and a component of the DEPARTMENT OF JUSTICE.

4. Defendant DEPARTMENT OF JUSTICE (“DOJ”) is a federal agency subject to the Freedom of Information Act, 5 U.S.C. § 552.

#### **JURISDICTION AND VENUE**

5. This case is brought under 5 U.S.C. § 552(a)(4)(B) and presents a federal question conferring jurisdiction on this Court. *See* 28 U.S.C. § 552.

6. Venue is proper under 5 U.S.C. § 552(a)(4)(B).

#### **JULY 25, 2019, FOIA REQUEST**

7. On July 25, 2019, EDDINGTON submitted a FOIA request to FBI for “copies of records previously provided to requester Assia Boundaoui regarding Operation VULGAR BETRAYAL.” Exhibit A.

8. EDDINGTON also requested expediting processing and a fee waiver. Exhibit A.

9. On August 1, 2019, the FBI acknowledged receipt of the request and assigned reference number 1443420-000 to the matter. Exhibit B.

10. On August 1, 2019, in a separate letter, the FBI denied the request for expedited processing. Exhibit C.

11. As of the date of this filing, FBI has not responded and has produced no records responsive to the request.

#### **COUNT I –FBI VIOLATION OF FOIA**

12. The above paragraphs are incorporated herein.

13. Defendants are agencies subject to FOIA.

14. The requested records are not exempt under FOIA.

15. Defendants have failed to produce the requested records.

**WHEREFORE**, Plaintiff asks the Court to:

- i. Order Defendants to conduct a reasonable search for records and to produce all non-exempt requested records;
- ii. Award Plaintiff's attorney fees and costs; and
- iii. Enter any other relief the Court deems appropriate.

Dated: February 11, 2020

Respectfully Submitted,

/s/ Joshua Hart Burday

Attorneys for Plaintiff,  
PATRICK EDDINGTON

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