

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

PETER S. HERRICK, P.A.
3520 Crystal View Court
Miami, Florida 33133,

Plaintiff,

v.

Civil Action No.

**U. S. CUSTOM AND
BORDER PROTECTION**
1300 Pennsylvania Ave. NW
Washington, D. C. 20229,

**COMPLAINT FOR
INJUNCTIVE RELIEF**

Defendant.

1. This is an action brought by the plaintiff, Peter S. Herrick, P.A. [“Herrick”] under the Freedom of Information Act [“FOIA”], 5 U.S.C. §552 to enjoin defendant, U. S. Customs and Border Protection [“Customs”] from withholding from public disclosure certain records of Customs within their possession and control.

2. This Court has jurisdiction over this action pursuant to 5 U.S.C. §552(a)(4)(B)

3. Herrick is a law firm.

4. Customs is an agency of the United States.

5. In a letter of October 12, 2007, Herrick, pursuant to the FOIA, requested Customs to provide the names and addresses, pursuant to 19 C.F.R. §103.32, of the identities of persons from whom Customs had seized currency and their cases were now closed.

7. Customs denied this request in a letter dated December 6, 2007.
8. A FOIA appeal of this denial was filed by Herrick with Customs in a letter dated December 11, 2007.
9. There has been no response to the FOIA appeal.
10. The 20 day appeal period has expired.
11. Herrick has exhausted its administrative remedies as provided by 5 U.S.C. §552(a)(6)(C)(i).

WHEREFORE, plaintiff respectfully requests the Court:

1. To take jurisdiction of this cause of action;
 2. To order Customs to immediately release the requested records to Herrick;
- and,
3. To grant such other and further relief as the Court may deem proper and just including attorney fees and costs.

Respectfully submitted,



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