

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Ronald Geddis,  
Plaintiff,

v.

Department of Homeland Security,  
Defendant.

Case: 1:23-cv-00191  
Assigned To : Unassigned  
Assign. Date : 1/23/2023  
Description: FOIA/Privacy Act (I-DECK)

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COMPLAINT FOR INJUNCTIVE RELIEF

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COMPLAINT FOR INJUNCTIVE RELIEF

Ronald Geddis, proceeding pro se, alleges upon knowledge as to his own acts, and otherwise information and belief, the following:

NATURE OF THE ACTION

1. This is an action under the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552 et seq., as amended; the Privacy Act ("PA"), 5 U.S.C. § 552a; and the Administrative Procedures Act ("APA"), 5 U.S.C. §§ 701-706, to order the production of agency records in the possession, custody, and control of the Department of Homeland Security (hereinafter "DHS").<sup>1</sup>

JURISDICTION AND VENUE

2. This court has jurisdiction over this action pursuant to 5 U.S.C. § 552 (a)(4)(B)(FOIA); 5 U.S.C. § 552(g)(1)(B)(PA); and 5 U.S.C. § 703 (APA).

3. Venue is in this district pursuant to 5 U.S.C. § 552(a)(4)(B)(FOIA); 5 U.S.C. § 552(g)(1)(B)(PA); and 5 U.S.C. § 703 (APA).

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<sup>1</sup> Although Geddis sent his original request to Homeland Security Investigations (HSI), Geddis names DHS as the Defendant in this action, as it is responsible for "responding to FOIA requests" from its various divisions, including HSI. See 6 C.F.R. § 5.3(a)(1).

PARTIES

4. Geddis, a citizen of the United States and a federal prisoner, is currently confined at the Federal Correctional Complex (Low Custody), in Coleman, Florida, and is the requestor of the withheld records.

5. Department of Homeland Security is a component of the Executive Branch. See 5 U.S.C. § 101. DHS has possession, custody, and control of the records Geddis seeks.

FACTUAL ALLEGATIONS

6. On August 17, 2022, Geddis sent, via Certified United States First Class Mail, a FOIA request to HSI, specifically requesting:

(1) indictment and charging documents; (2) transcripts of pre-trial proceedings; (3) discovery; (4) copies of plea agreements and drafts thereof; (5) audio o[r] video recordings of any pre- or post-arrest interrogations or interviews of individual; (6) arrest warrants; (7) search warrants, subpoenas and their attendant affidavits; (8) handwritten or field notes; (9) email communication between USAO MDFL and HSI; (10) email communications between [HSI] and the Hillsborough County Sheriff's Office; and (11) any and all other information not listed above and not exempt under law.

7. HSI has neither responded to Geddis's request, nor have HSI produced responsive records.

COUNT I: VIOLATION OF FOIA/PA

8. This count realleges and incorporates by reference all of the preceding paragraphs.

9. Geddis has a statutory right to the records he seeks.

10. Defendant has a responsibility to respond to FOIA/PA requests within a set timeframe, and Defendant has failed to do so. See 6 C.F.R. §§ 1001.6(b) and 1001.8(c).

11. Defendant's non-responsiveness and withholding the items sought amounts to a refusal to produce them.

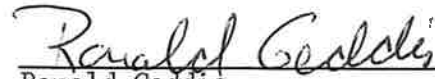
12. Defendant has violated FOIA/PA by improperly withholding records responsive to Geddis's FOIA/PA request.

RELIEF REQUESTED

Wherefore Geddis requests that this court:

- (a) Declare Defendant's failure to comply with FOIA/PA to be unlawful;
- (b) Enjoin Defendant from continuing to withhold records responsive to Geddis's FOIA/PA request, and otherwise order Defendant to produce the requested records without delay;
- (c) Provide expeditious proceedings in this action; and
- (d) Grant any other and further relief as this court may deem to be just and proper.

Respectfully submitted<sup>2</sup> by Ronald Geddis on this 13 day of January, 2023:



Ronald Geddis  
Reg. No.: 71625-018  
Federal Correctional Complex  
Unit B-2 (Low Custody)  
P.O. Box 1031  
Coleman, FL 33521-1031

#### CERTIFICATE OF SERVICE

This complaint was delivered to the prison mailing authorities on the same day as signed, and placed inside a postage-prepaid, properly addressed envelope. The original complaint was delivered via United States First Class Mail to the United States District Court for the District of Columbia, Office of the Clerk at 333 Constitution Avenue, Washington, D.C., 20001., USPS Tracking No.:7022 1670 0001 4335 7550. Pursuant to Fed. R. Civ. P. 4(c)(1) et seq., Geddis has attached copies of this complaint, along with the appropriate summonses, in order that a United States Marshal may effectuate service on the Defendant.

  
Ronald Geddis

#### VERIFICATION

Under penalty of perjury pursuant to 28 U.S.C. § 1746, I hereby declare that the factual allegations and factual statements contained in this complaint are true and correct to the best of my knowledge.

  
Ronald Geddis

<sup>2/</sup> Pursuant to Johnson v. Avery, 393 U.S. 483 (1969), I received assistance from a fellow inmate with the preparation and serving of this complaint.