

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Case: 1:23-cv-02030  
Assigned To : Unassigned  
Assign. Date : 7/14/2023  
Description: FOIA/Privacy Act (I-DECK)

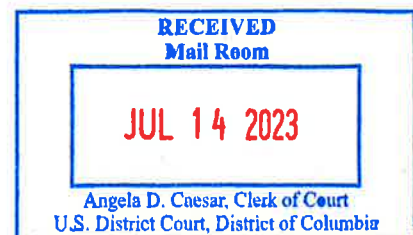
CRAWFORD BOGLE  
Plaintiff

v.

DEPARTMENT OF JUSTICE DRUG ENFORCEMENT ADMINISTRATION  
Defendant

COMPLAINT

Mr. Crawford Bogle  
Pro Se Plaintiff  
P.O. Box 2000  
Joint Base MDL, NJ 08640



I. Parties

Plaintiff:

Crawford Bogle  
Federal Register No. 71461-061  
Federal Corrections Institute-Fort Dix  
P.O. Box 2000  
Joint Base MDL, NJ 08640

Defendant:

Drug Enforcement Administration, D.O.J.  
Freedom of Information/Privacy Act Unit  
F.O.I./Records Management Section  
8701 Morrisette Drive  
Springfield, VA 22152

II. Facts

1. On March 7, 2023, Mr. Crawford Bogle did file a request for records, pursuant to the Freedom of Information/Privacy Act, from the Drug Enforcement Administration. See Appendix Exhibit "A" (copy of the request for records sent to defendant's above captioned address). Mr. Bogle's request provided essential background information sufficient to assist the F.O.I.P.A. Unit locate and provide the 2 requested records. Mr. Bogle's limited request requested records of the final laboratory analysis of both the 800 grams of methamphetamine and 300 grams of fentanyl that was seized from a residence in Dayton, Ohio and later used as evidence in criminal proceedings that resulted in Mr. Bogle's conviction. See United States v. Bogle, Criminal No. 3:19-00137-01 (S.D. Oh. 2019).

2. On March 9, 2023, Maurice White signed the return receipt acknowledging the D.E.A.'s receiving Mr. Bogle's request. See Appendix Exhibit "B" (copy of Certified Mail receipts).

3. As of the date of the drafting and filing of this Complaint, July 11, 2023, the D.E.A. has not complied with the provisions of the Act by both failing to provide Mr. Bogle with notice of its determination either provide Mr. Bogle with the requested records or that the requested records are exempt from disclosure under the Act pursuant to 5 U.S.C. §552(a)(6)(A)(i), and by failing to provide Mr. Bogle with notice that his request cannot be processed within the 20-day time limit and an extension will be necessary to process his request pursuant to 5 U.S.C. §552(a)(6)(B)(ii).

4. As a result of the D.E.A.'s investigation and Mr. Bogle's subsequent conviction, Mr. Bogle was sentenced to 216 months in federal prison.

5. Pursuant to 5 U.S.C. §552(a)(6)(C)(i) Mr. Bogle has exhausted his administrative remedies and has complied with the provisions of the Prison Litigation Reform Act as over 120 days has passed since the filing of his F.O.I.A. request.

### III. Injuries

1. Mr. Bogle has been denied his statutory right to review and obtain non-exempt records in possession of a governmental agency.

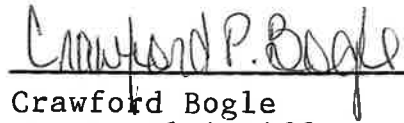
2. Mr. Bogle has been denied his constitutional due process right to present a complete defense by the D.E.A.'s withholding of the requested records.

IV. Requested Relief

1. This Court declare that the D.E.A.D.O.J. is in violation of the provisions of the F.O.I. Act.

2. This Court enter an Order for the D.E.A.D.O.J. to produce the requested records and deliver them to the plaintiff.

Respectfully Submitted,

A handwritten signature in black ink that reads "Crawford P. Bogle". The signature is written in a cursive style and is positioned above a horizontal line.

Crawford Bogle  
Pro Se Plaintiff  
P.O. Box 2000  
Joint Base MDL, NJ 08640