

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

JAMIL SROUR,)
)
1601 N. 2nd Street, Suite A-1)
Millville, NJ 08332,)
)
Plaintiff,)
)
v.)
)
UNITED STATES CITIZENSHIP AND)
IMMIGRATION SERVICES,)
)
20 Massachusetts Avenue, NW)
Washington, DC 20529,)
)
Defendant.)

Case No. 1:16-cv-400

COMPLAINT

1. Plaintiff brings this action under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, seeking the disclosure and release of agency records improperly withheld from the plaintiff by defendant United States Citizenship and Immigration Services (USCIS).

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 5 U.S.C. § 522(a)(4)(B) and 28 U.S.C. § 1331.

3. Venue is proper under 5 U.S.C. § 522(a)(4)(B).

THE PARTIES

4. USCIS is the administrative agency charged with adjudicating applications for adjustment of status for asylees. 8 C.F.R. § 209. USCIS is headquartered at 20

Massachusetts Avenue, NW, Washington, DC 20529, within the judicial district of the United States District Court for the District of Columbia.

5. Plaintiff Jamil Srour is an asylee residing in the United States. He was granted asylum on or about May 23, 2000. He applied for adjustment of status pursuant to 8 C.F.R. § 209.2 on or about January 21, 2001. USCIS denied his application on or about February 12, 2008.

**PLAINTIFF'S FOIA REQUEST AND THE DEFENDANT'S
FAILURE TO RESPOND**

6. Plaintiff filed a FOIA request with defendant on or about September 29, 2015.

7. By letter dated October 19, 2015, defendant acknowledged receipt of this request.

8. To date, USCIS has provided no records in response to the FOIA request, notwithstanding FOIA's requirement of an agency response within twenty (20) working days.

9. Pursuant to 5 U.S.C. §522(a)(6)(C)(i), plaintiff has exhausted his administrative remedies, and may seek judicial review in federal court.

10. Defendant has wrongfully withheld the requested records from the plaintiff.

REQUESTED RELIEF

WHEREFORE, plaintiff respectfully requests that this Court:

- A. Order defendant to disclose the requested records to the plaintiff;
 - B. Provide for expeditious proceedings in this action;
 - C. Award plaintiff his costs and reasonable attorneys fees incurred in this action;
- and
- D. Grant such other relief as the Court may deem just and proper.

Respectfully submitted,

/s/

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