

Attachment 1

Statement of Claim

In summary, the Defendant in this case, the Federal Bureau of Investigation, is an agency of the United States and has possession of the documents and records, which the plaintiff has sought access to.

In a July 1, 2015 Privacy Act Request (labeled *Exhibit 1*), the plaintiff requested access to records, which should contain references to the FBI's interaction, and that of its "civilian" proxies such as InfraGard, with the plaintiff, his family, friends and contacts on three continents and seven countries.

The plaintiff believes that there are gross inaccuracies in records created and maintained by the Federal Bureau of Investigation, and that those records, along with the plaintiff's personally identifiable information (PII), were subsequently relayed to third parties (see *Attachment 1B*).

Thus, the plaintiff requested records in order to:

- 1) Correct the inaccurate, false, defamatory and demeaning information on record, and;
- 2) Further detail the outrageous government conduct, civil rights violations, and Privacy Act violations, perpetrated by FBI personnel, their proxies and civilian hirees, for pending litigation based on the FTCA and a Biven's Action.

In a letter dated July 16, 2015, the defendant denied the plaintiff access to the requested information on the grounds that the records were exempt from disclosure under FOIA Exemption (b)(7)E/ Privacy Act Exemption (j)(2) [5 U.S.C. § 552/552a (b)(7)(E)/(j)(2)].

A copy of this letter is attached as *Exhibit 2*.

In a letter dated July 31, 2015, the plaintiff appealed the denial of this request. A copy of this letter is attached as *Exhibit 3*.

In a letter dated August 24, 2015, the plaintiff's appeal was denied. A copy of this letter is attached as *Exhibit 4*.

The Plaintiff has a right of access to the requested information under 5 U.S.C. § 552(a)(3), and as such there is no legal basis for defendant's refusal to release the records as specified.

Requested Relief

Wherefore, the plaintiff respectfully requests that this Court:

- (1) Order defendant immediately to state which records it intends to disclose in response to plaintiffs' FOIA request;
- (2) order defendant to provide access to the requested documents;
- (3) expedite this proceeding;
- (4) award plaintiff costs and reasonable attorneys fees in this action, and
- (5) grant such other and further relief as may deem just and proper.