

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JASON LEOPOLD,)	
6824 Lexington Avenue)	
Los Angeles, CA 90038,)	Judge _____
)	Civil Action No. _____
and)	
)	
BUZZFEED, INC.,)	
111 E. 18 th St.)	
New York, NY 10003,)	
)	
PLAINTIFFS)	
vs.)	
)	
CENTRAL INTELLIGENCE AGENCY,)	
Washington, DC 20505)	
)	
DEFENDANT.)	
)	
)	

COMPLAINT

THE PARTIES

1. Plaintiff Jason Leopold is a Senior Investigative Reporter for Buzzfeed News covering a wide range of issues.
2. Plaintiff Buzzfeed, Inc. (BuzzFeed) is a social news and entertainment company.
3. Defendant Central Intelligence Agency (CIA) is an agency of the United States.
4. CIA has possession, custody and control of the records Plaintiffs seek.

JURISDICTION AND VENUE

5. This action arises under the Freedom of Information Act (“FOIA”), 5 USC § 552.

6. This Court has jurisdiction over the parties and subject matter pursuant to 5 USC § 552(a)(4)(B).

7. Venue is proper in this district pursuant to 5 USC § 552(a)(4)(B).

STATEMENT OF FACTS

8. On July 24, 2017, President Donald Trump tweeted, “The Amazon Washington Post fabricated the facts on my ending massive, dangerous, and wasteful payments to Syrian rebels fighting Assad.....”

9. President Trump’s tweet constitutes official acknowledged that the United States had been making payments to Syrian rebels fighting Assad.

10. On September 12, 2017, Plaintiffs submitted a FOIA request to CIA for:

- a) Any and all CIA studies, memos, assessments, and intelligence products, mentioning or referring to CIA payments to Syrian rebels fighting Assad;
- b) Any and all emails mentioning or referring to CIA payments to Syrian rebels fighting Assad;
- c) Any and all correspondence to or from a member of Congress or a Congressional Committee mentioning or referring to CIA payments to Syrian rebels fighting Assad;
- d) Any and all records that mentions or refers to the July 24, 2017 by President Donald Trump:

<https://twitter.com/realDonaldTrump/status/889672374458646528>. The tweet states: “The Amazon Washington Post fabricated the facts on my ending

massive, dangerous, and wasteful payments to Syrian rebels fighting Assad.....”;

- e) Any and all records mentioning or referring to the ending of the CIA’s payments to Syrian rebels fighting Assad; and
- f) Any and all records authorizing the CIA to make payments to Syrian rebels fighting Assad. This request includes, but is not limited to, the “FINDING” authorized by President Barack Obama.

11. The request sought a waiver of fees and status as a representative of the news media for fee purposes.

12. In a letter dated September 25, 2017, CIA acknowledged receiving Plaintiffs’ request on September 14, 2017 and assigned the request tracking number F-2017-02526. The letter further indicated that Plaintiffs’ request for a waiver of fees had been granted.

13. As of the filing of this Complaint, Plaintiffs have not received a final decision from the CIA as to whether or not it will comply with the FOIA request.

COUNT I:
VIOLATION OF FOIA

14. This Count realleges and incorporates by reference all of the preceding paragraphs. All documents referenced in this Complaint are incorporated by reference as if set forth fully herein.

15. Plaintiffs are deemed to have exhausted their administrative remedies with respect to F-2017-02526 because over 20 business days have elapsed without a final determination as to whether CIA will comply with Plaintiffs’ FOIA request.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

- (1) Declare Defendant's failure to comply with FOIA to be unlawful;
- (2) Order Defendant to immediately process Plaintiffs' FOIA request and produce any non-exempt, responsive records;
- (3) Grant Plaintiffs an award of attorney fees and other litigation costs reasonably incurred in this action pursuant to 5 USC § 552(a)(4)(E)(i);
- (4) Grant Plaintiffs such other and further relief which the Court deems proper.

Respectfully Submitted,

/s/ Jeffrey Light

Jeffrey L. Light
D.C. Bar #485360
1712 Eye St., NW
Suite 915
Washington, DC 20006
(202)277-6213
Jeffrey@LawOfficeOfJeffreyLight.com

Counsel for Plaintiffs