

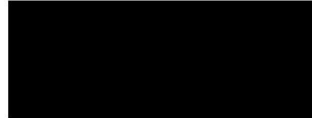
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CINDY LOU YOUNG, *Pro Se*



and

DAVID SUMRALL, *Pro Se*



Plaintiffs,

v.

UNITED STATES DEPARTMENT OF JUSTICE,
including the Executive Office for United States Attorneys,
the Office of the Inspector General, and the Office of Information Policy,

and

FEDERAL BUREAU OF INVESTIGATION,

Defendants.

Civil Action No. _____

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Angela D. Caesar, Clerk of Clerk
U.S. District Court District of Columbia

Case: 1:25-cv-03955

Assigned To : Chutkan, Tanya S.

Assign. Date : 11/13/2025

Description: FOIA/Privacy Act (I-DECK)

**JOINT COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF UNDER
THE FREEDOM OF INFORMATION ACT**

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I. INTRODUCTION AND NATURE OF ACTION

1. Plaintiffs **Cindy Lou Young** and **David Sumrall** bring this civil action under the **Freedom of Information Act (FOIA)**, 5 U.S.C. § 552, to compel the defendants—the United States Department of Justice (“DOJ”), including its components the **Executive Office for United States Attorneys (EOUSA)**, the **Office of the Inspector General (OIG)**, and the **Office of Information Policy (OIP)**, as well as the **Federal Bureau of Investigation (FBI)**—to promptly produce agency records wrongfully withheld from them.
2. This action seeks to enforce FOIA’s core purpose of ensuring transparency and accountability in government actions, particularly those involving investigative conduct, prosecutorial oversight, and the protection of constitutional rights.
3. Plaintiffs have submitted multiple FOIA requests to the named agencies concerning a single overarching factual matter: the **FBI’s visit to David Sumrall**, its authorization, oversight, and related internal communications involving DOJ personnel, including Assistant United States Attorney **Shehzad Akhtar**, who was assigned to Plaintiff Young’s criminal case.

4. Despite the statutory requirement that agencies respond within twenty (20) business days, the Defendants have failed to issue determinations or produce records responsive to these requests. Plaintiffs therefore seek declaratory and injunctive relief.

II. JURISDICTION AND VENUE

5. This Court has jurisdiction over this action under **5 U.S.C. § 552(a)(4)(B)** and **28 U.S.C. § 1331**.
6. Venue is proper in this judicial district under **5 U.S.C. § 552(a)(4)(B)** because the defendants are agencies of the United States Government with principal offices located in Washington, D.C., and the records sought are situated in this district.

III. PARTIES

7. Plaintiff **Cindy Lou Young** is a private citizen residing in Bristol, New Hampshire. She is proceeding *pro se*.
8. Plaintiff **David Sumrall** is a private citizen residing in Rockwall, Texas. He is proceeding *pro se*.
9. Defendant **United States Department of Justice (DOJ)** is an agency of the United States Government and includes, inter alia, the **Executive Office for United States Attorneys (EOUSA)**, the **Office of the Inspector General (OIG)**, and the **Office of Information Policy (OIP)**.
10. Defendant **Federal Bureau of Investigation (FBI)** is a component of the DOJ and an agency subject to the requirements of FOIA.

IV. FACTUAL BACKGROUND

11. On **October 10, 2025**, Plaintiffs submitted a FOIA request to the **Executive Office for United States Attorneys** seeking all records identifying who authorized or directed the

FBI's visit to David Sumrall.

Tracking No. 2451771.

12. On **October 10, 2025**, Plaintiffs submitted a FOIA request to the **Federal Bureau of Investigation** seeking all records identifying who authorized or directed the FBI's visit to David Sumrall.

Tracking No. 2451756.

13. On **October 10, 2025**, Plaintiffs submitted a FOIA request to the **DOJ Office of the Inspector General (OIG)** seeking records of oversight, communications, or internal discussions regarding the FBI's visit to David Sumrall.

Tracking No. 2451776.

14. On **October 10, 2025**, Plaintiff **Young** submitted a separate FOIA request to the **FBI** seeking her **complete case file** pertaining to *United States v. Cindy Young, Case No. 1:23-cr-00241 (D.D.C.)*.

Tracking No. 2451906.

15. On **August 7, 2025**, Plaintiff **Young** submitted a FOIA request by email to the **DOJ Office of Information Policy (OIP)** seeking records relating to the assignment, authorization, or directives given to Assistant United States Attorney **Shehzad Akhtar** concerning Plaintiff Young's prosecution and related matters.
16. The statutory 20-day deadline for agency responses has expired. To date, none of the Defendants have issued a proper determination letter, provided responsive records, or asserted any lawful basis for withholding.
17. On **October 20, 2025**, the FBI acknowledged receipt of one request but stated that "due to a lapse in Government Appropriations, receipt and response to FOIA requests will be delayed." No further communication or production has occurred.
18. Plaintiffs have exhausted administrative remedies by virtue of the agencies' failure to comply with FOIA's time limits.
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V. REQUEST FOR EXPEDITED PROCESSING

19. Plaintiffs respectfully request **expedited processing** under 5 U.S.C. § 552(a)(6)(E) on the grounds that this action concerns an **urgent need to inform the public about actual or alleged government activity**.
20. The requested records concern DOJ and FBI actions, authorizations, and internal communications regarding an FBI visit to David Sumrall and prosecutorial conduct affecting matters of public controversy, governmental oversight, and constitutional rights.
21. The public has a compelling interest in understanding the scope and authorization of these government actions and their potential implications for First Amendment freedoms and accountability.

VI. CAUSES OF ACTION

Count I – Violation of FOIA by the Executive Office for United States Attorneys

22. Plaintiffs repeat and reallege the foregoing paragraphs.
23. The EOUSA has failed to determine whether to comply with Plaintiffs' FOIA request (Tracking No. 2451771) and to produce requested records or provide any lawful basis for withholding.
24. EOUSA's failure constitutes a violation of FOIA, 5 U.S.C. § 552(a)(6)(A).

Count II – Violation of FOIA by the Federal Bureau of Investigation (Sumrall Authorization Request)

25. Plaintiffs repeat and reallege the foregoing paragraphs.
26. The FBI has failed to produce records or issue a final determination on Tracking No. 2451756.
27. This delay violates FOIA, 5 U.S.C. § 552(a)(6)(A).

Count III – Violation of FOIA by the DOJ Office of the Inspector General

28. Plaintiffs repeat and reallege the foregoing paragraphs.

29. The OIG has failed to acknowledge or respond to Plaintiffs' FOIA request (Tracking No. 2451776).

30. This constitutes an improper withholding of agency records under FOIA.

Count IV – Violation of FOIA by the Federal Bureau of Investigation (Plaintiff Young's Case File)

31. Plaintiffs repeat and reallege the foregoing paragraphs.

32. The FBI has failed to respond to Plaintiff Young's request for her full case file (Tracking No. 2451906).

33. The FBI's failure to conduct a reasonable search and to produce responsive records violates FOIA.

Count V – Violation of FOIA by the DOJ Office of Information Policy

34. Plaintiffs repeat and reallege the foregoing paragraphs.

35. The OIP has failed to respond to Plaintiff Young's August 7, 2025 FOIA request regarding AUSA Shehzad Akhtar.

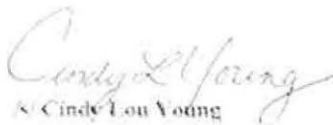
36. OIP's inaction constitutes an unlawful withholding under FOIA.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

- A. Declare that Defendants have violated FOIA by failing to respond within the statutory time limits;
 - B. Order Defendants to immediately conduct adequate searches for all records responsive to Plaintiffs' FOIA requests;
 - C. Order Defendants to promptly produce all non-exempt responsive records;
 - D. Award Plaintiffs reasonable costs and fees pursuant to 5 U.S.C. § 552(a)(4)(E); and
 - E. Grant such other and further relief as the Court deems just and proper.
-

Respectfully submitted,



/s/ Cindy Lou Young

Cindy Lou Young, *Pro Se*





/s/ David Sumrall

David Sumrall, *Pro Se*

