

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JACQUELINE BOTTS

North Carolina,

Plaintiff,

v.

**U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT**

500 12th Street SW
Washington, DC 20536,

**CUSTOMS AND BORDER
PROTECTION**

1300 Pennsylvania Avenue, Suite 4.4-B
Washington, DC 20229,

U.S. MARSHALS SERVICE

CG-3, 15th Floor
Washington, DC 20530,

**FEDERAL BUREAU OF
INVESTIGATION**

935 Pennsylvania Avenue NW
Washington, DC 20535,

**DRUG ENFORCEMENT
ADMINISTRATION**

8701 Morrisette Drive
Springfield, VA 22152,

**EXECUTIVE OFFICE FOR UNITED
STATES ATTORNEYS**

950 Pennsylvania Avenue NW
Washington, DC 20530,

**UNITED STATES DEPARTMENT OF
JUSTICE**

950 Pennsylvania Avenue NW
Washington, DC 20530,

Civil Action No. _____

DEPARTMENT OF THE NAVY

1000 Navy Pentagon
Washington, DC 20350,

**NAVAL FACILITIES ENGINEERING
SYSTEMS COMMAND**

1322 Patterson Avenue SE, Suite 1000
Washington Navy Yard, DC 20374,

U.S. NORTHERN COMMAND

250 Vandenberg, Suite B-016
Peterson SFB, CO 80914,

and

**CALIFORNIA ARMY NATIONAL
GUARD**

10601 Bear Hollow Drive
Rancho Cordova, CA 95670,

Defendants.

COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF

Plaintiff Jacqueline Botts (“Plaintiff”),¹ by and through her undersigned counsel, hereby alleges as follows:

1. Plaintiff brings this action under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), for declaratory, injunctive, and other appropriate relief against U.S. Immigration and Customs Enforcement (“ICE”), Customs and Border Protection (“CBP”), the U.S. Marshals Service (“USMS”), the Federal Bureau of Investigation (“FBI”), the Drug Enforcement Administration (“DEA”), the Executive Office for United States Attorneys (“EOUSA”), the Department of Justice (“DOJ”),

¹ A contemporaneous Notice containing Ms. Botts’ full residential address has been filed with the Court under seal.

the Department of the Navy (“Navy”), the Naval Facilities Engineering Systems Command (“NAVFAC”), U.S. Northern Command (“NORTHCOM”), and the California Army National Guard (“California Guard”) (collectively, “Defendants”).

2. By this action, Plaintiff seeks to compel Defendants to comply with their obligations under FOIA to release records pertaining to the immigration raids at Glass House Farms on July 10, 2025, in Carpinteria, California and Camarillo, California (the “Glass House Raids”). Plaintiff is statutorily entitled to the disclosure of these records, and Defendants have improperly withheld them in violation of FOIA.

Jurisdiction and Venue

3. The Court has subject matter jurisdiction over this action and personal jurisdiction over Defendants under 28 U.S.C. § 1331 and 5 U.S.C. § 552(a)(4)(B).

4. Venue lies in this district under 5 U.S.C. § 552(a)(4)(B).

Parties

5. Plaintiff Jacqueline Botts is an independent data reporter. She was part of a Reuters News team awarded a Pulitzer Prize in Explanatory Reporting in 2021.

6. Defendant ICE is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. ICE’s headquarters are located at 500 12th Street SW, Washington DC 20536.

7. Defendant CBP is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or

control of the records that Plaintiff seeks. CBP's headquarters are located at 1300 Pennsylvania Avenue, Suite 4.4-B, Washington DC 20229.

8. Defendant USMS is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. USMS is a component of Defendant United States Department of Justice and is located at CG-3, 15th Floor, Washington DC 20530.

9. Defendant FBI is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. FBI is a component of Defendant United States Department of Justice and is located at 935 Pennsylvania Avenue NW, Washington DC 20535.

10. Defendant DEA is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. DEA is a component of Defendant United States Department of Justice and is located at 8701 Morrisette Drive, Springfield, VA 22152.

11. Defendant EOUSA is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. EOUSA is a component of Defendant United States Department of Justice and is located at 950 Pennsylvania Avenue NW, Washington DC 20530.

12. Defendant DOJ is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. The DOJ's headquarters are located at 950 Pennsylvania Avenue NW, Washington DC 20530.

13. Defendant Navy is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. The Navy's headquarters are located at 1000 Navy Pentagon, Washington DC 20530.

14. Defendant NAVFAC is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. NAVFAC's headquarters are located at 1322 Patterson Avenue SE, Suite 1000, Washington Navy Yard, DC 20374.

15. Defendant NORTHCOM is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. NORTHCOM's headquarters are located at 250 Vandenberg, Suite B-016, Peterson Space Force Base, CO 80914.

16. Defendant California Guard is an agency of the federal government within the meaning of 5 U.S.C. § 551 and 5 U.S.C. § 552(f)(1) that has possession, custody, and/or control of the records that Plaintiff seeks. The California Guard's headquarters are located at 10601 Bear Hollow Drive, Rancho Cordova, CA 95670.

Facts

17. Between April 14, 2026, and May 4, 2026, Plaintiff submitted FOIA requests to Defendants (the “Requests”).

The ICE Request

18. On April 14, 2026, Plaintiff submitted a FOIA request to ICE via FOIA.gov (the “ICE Request”). A true and correct copy of the ICE Request is attached hereto as **Exhibit 1** and is incorporated by reference.

19. The ICE Request sought:

- All draft, unsigned I-213 “Record of Deportable/Inadmissible Alien” forms, with corresponding I-831 “Continuation Form”, for a.) each individual detained or taken into custody by staff from ICE’s Los Angeles Field Office and all sub-offices during the Glass House Raids; b.) each individual transferred to the custody of staff from ICE’s Los Angeles Field Office and all sub-offices by other federal, state or local law enforcement officials, during or as a result of the Glass House Raids. Please note that ICE has previously released this type of record to requestors, including in the following requests made by representatives of the University of Washington Center for Human Rights: 2018-ICFO-14208 (appealed with # 2018-ICAP-0029) and 2022-ICFO-02878.
- All “Report of Investigation” reports that arose from the Glass House Raids. [...]²
- All “Situational Reports” (SITREP) that arose from the Glass House Raids. [...]
- All “Significant Incident Reports” that arose from the Glass House Raids. [...]
- All warrants served during the Glass House Raids.
- All itemized Inventories of Seized Property and Receipts for Property generated during the Glass House Raids.

² Plaintiff provided links to example forms, which are omitted in this Complaint.

- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All reports of use-of-force incidents, as well as assaults against law enforcement officers, arising from the Glass House Raids, including those that occurred inside the premises of the Glass House Farms facilities as well as those that occurred outside of the facilities during protests and crowd control activities. This includes all “reportable” incidents defined in the U.S. Department of Homeland Security Policy on the Use of Force as “any injury or death to an officer, subject, or bystander; any use of deadly force against a person, including when a firearm is discharged at a person; any intentional deployment of a less-lethal device against a subject; and any use of a vehicle, weapon, or physical tactic or technique that delivers a kinetic impact to a subject,” including use-of-force from canines.
- All documents that mention or refer to Jaime Alanis Garcia or his death, including but not limited to internal investigations, medical reports, officer or witness testimony, legal analysis, and digital correspondence including text or email.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the] Federal Tort Claims Act (FTCA) or any other claim procedures arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage, Injury or Death” forms submitted to your agency that arose from the Glass House Raids.
- All records reflecting the total number of ICE agents present during the Glass House Raids, including the names of the ICE units present (Homeland Security Investigations, Enforcement and Removal Operations, Special Response Team) and their base of operations.
- All records that document the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.

- All records that document the count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.

Ex. 1.

20. The ICE Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 1.

21. On July 29, 2026, Plaintiff received via email a letter from ICE denying the ICE Request under FOIA Exemption 7(A). A copy of the letter is attached hereto as **Exhibit 2**.

22. On August 4, 2026, Plaintiff submitted an administrative appeal to ICE via the SecureRelease Portal challenging the applicability of Exemption 7(A) (the “ICE Appeal”). A true and correct copy of the ICE Appeal, without exhibits, is attached as **Exhibit 3**.

23. On August 31, 2026, Plaintiff received via email a letter denying the ICE Appeal. A true and correct copy of the letter is attached as **Exhibit 4**.

The CBP Request

24. On April 14, 2026, Plaintiff submitted a FOIA request to CBP via FOIA.gov (the “CBP Request”). A true and correct copy of the CBP Request is attached hereto as **Exhibit 5** and is incorporated by reference.

25. The CBP Request sought:

- All warrants served during the Glass House Raids.
- All itemized Inventories of Seized Property and Receipts for Property generated during the Glass House Raids, including all “CBP Form

6051D Detention Notice and Custody Receipts for Detained Property” generated as a result of the Glass House Raids.

- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All Customs and Border Protection Enforcement Action Statistical Analysis and Reporting System (E-STAR) Incident Reports for use-of-force incidents, as well as assaults against officers, arising from the Glass House Raids, including those that occurred inside the premises of the Glass House Farms facilities as well as those that occurred outside of the facilities during protests and crowd control activities. This includes all “reportable” incidents defined in the U.S. Department of Homeland Security Policy on the Use of Force as “any injury or death to an officer, subject, or bystander; any use of deadly force against a person, including when a firearm is discharged at a person; any intentional deployment of a less-lethal device against a subject; and any use of a vehicle, weapon, or physical tactic or technique that delivers a kinetic impact to a subject,” including use-of-force from canines. Please note that CBP has released such use-of-force reports on its public website for incidents that took place during previous years.
- All Memorandums with a subject line that includes the key term “Use of Force” that arose from the Glass House Raids. [...]
- All Evolving Situation Reports that arose from the Glass House Raids. [...]
- All Significant Incident Reports that arose from the Glass House Raids.
- All Firearm Discharge reports that arose from the Glass House Raids. [...]
- All documents that mention or refer to Jaime Alanis Garcia or his death, including but not limited to internal investigations, medical reports, officer or witness testimony, legal analysis, and digital correspondence including text or email.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the]

Federal Tort Claims Act (FTCA) or any other claim procedures arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage, Injury or Death” forms submitted to your agency that arose from the Glass House Raids.

- All records reflecting the total number of CBP agents present during the Glass House Raids, including the names of the CBP units present (ex. Border Patrol, BORTAC, BORSTAR) and their base of operations.
- All records that document the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.
- All records that document the count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.

Ex. 5.

26. The CBP Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 5.

27. On April 21, 2026, Plaintiff received an email from CBP assigning tracking number CBP-FO-2026-087938 to the CBP Request. A true and correct copy of the email is attached hereto as **Exhibit 6**.

28. As of the date of the filing of this Complaint, it has been approximately 142 calendar days and 98 business days since Plaintiff submitted the CBP Request.

29. As of the date of the filing of this Complaint, Plaintiff has received no further communications from CBP regarding the CBP Request.

The USMS Request

30. On April 15, 2026, Plaintiff submitted a FOIA request to USMS via FOIA.gov (the “USMS Request”). A true and correct copy of the USMS Request is attached hereto as **Exhibit 7** and is incorporated by reference.

31. The USMS Request sought:

- All warrants served during the Glass House Raids.
- All itemized Inventories of Seized Property and Receipts for Property generated during the Glass House Raids.
- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All records reflecting the total number of Marshals Service agents present during the Glass House Raids, including the names of the units present and their base of operations.
- All records that document the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.
- The count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- All prisoner data records maintained in the U.S. Marshals Service Justice Detainee Information System that concern people taken into custody during the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the] Federal Tort Claims Act (FTCA) or any other claim procedures arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage,

Injury or Death” forms submitted to your agency that arose from the Glass House Raids.

- All situation reports, significant incident reports, and use of force reports that were generated during or arose from the Glass House Raids.

Ex. 7.

32. The USMS Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 7.

33. On April 15, 2026, Plaintiff received an email from USMS assigning tracking number 2026-USMS-001402 to the USMS Request. A true and correct copy of the email is attached hereto as **Exhibit 8**.

34. On April 20, 2026, Plaintiff received via email a letter from USMS assigning the USMS Request to the “complex queue.”

35. As of the date of the filing of this Complaint, it has been approximately 141 calendar days and 97 business days since Plaintiff submitted the USMS Request.

36. As of the date of the filing of this Complaint, Plaintiff has received no further communications from USMS regarding the USMS Request.

The FBI Request

37. On April 15, 2026, Plaintiff submitted a FOIA request to the FBI via FOIA.gov (the “FBI Request”). A true and correct copy of the FBI Request is attached hereto as **Exhibit 9** and is incorporated by reference.

38. The FBI Request sought:

- All warrants served during the Glass House Raids.

- All itemized Inventories of Seized Property and Receipts for Property generated during the Glass House Raids.
- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All documents that mention or refer to Jaime Alanis Garcia or his death, including but not limited to internal investigations, medical reports, officer or witness testimony, legal analysis, and digital correspondence including text or email.
- All records reflecting the total number of FBI agents present during the Glass House Raids, including the names of the FBI units present and their base of operations.
- All records that document how many FBI agents were present at Naval Base Ventura County facilities on the day of the Glass House Raids.
- All records that document the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.
- The count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the] Federal Tort Claims Act (FTCA) or any other claim procedures arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage, Injury or Death” forms submitted to your agency that arose from the Glass House Raids.
- All situation reports, significant incident reports, and use of force reports that were generated or arose from the Glass House Raids.

- All reports of use-of-force incidents by any federal agent from any federal agency arising from the Glass House Raids and maintained by the FBI as part of its National Use of Force Data Collection effort.

Ex. 9.

39. The FBI Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 9.

40. On April 21, 2026, Plaintiff received via email a letter from the FBI denying the FBI Request because the FBI was “unable to identify records subject to the FOIPA that are responsive to [the FBI Request].” A copy of the letter, with Plaintiff’s address redacted, is attached hereto as **Exhibit 10**.

41. On May 14, 2026, Plaintiff submitted an administrative appeal to DOJ’s Office of Information Policy (“OIP”) via FOIA STAR regarding the FBI’s failure to conduct a reasonable search (the “FBI Appeal”). A true and correct copy of the FBI Appeal, without exhibits, is attached hereto as **Exhibit 11**.

42. On May 20, 2026, Plaintiff received via email a letter from OIP denying the FBI Appeal. A true and correct copy of this letter is attached hereto as **Exhibit 12**.

The DEA Request

43. On April 15, 2026, Plaintiff submitted a FOIA request to the DEA via FOIA.gov (the “DEA Request”). A true and correct copy of the DEA Request is attached hereto as **Exhibit 13** and is incorporated by reference.

44. The DEA Request sought:

- All warrants served during the Glass House Raids.

- All itemized Inventories of Seized Property and Receipts for Property generated during the Glass House Raids.
- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All records reflecting the total number of DEA agents present during the Glass House Raids, including the names of the DEA units present and their base of operations.
- All documents that mention or refer to Jaime Alanis Garcia or his death, including but not limited to internal investigations, medical reports, officer or witness testimony, legal analysis, and digital correspondence including text or email.
- All records reflecting the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.
- The count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.
- All records mentioning, referring to or constituting DEA investigations or inspections of Glass House Farms operations since 2015.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the] Federal Tort Claims Act (FTCA) or any other claim procedures arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage, Injury or Death” forms submitted to your agency that arose from the Glass House Raids.
- All situation reports, significant incident reports, and use of force reports that were generated or arose from the Glass House Raids.

Ex. 13.

45. The DEA Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 13.

46. On April 21, 2026, Plaintiff received via email a letter from the DEA denying the DEA Request because “[i]t appears that [Plaintiff sought] records that would most likely be maintained by [ICE].” A true and correct copy of the letter is attached hereto as **Exhibit 14**.

47. On May 11, 2026, Plaintiff submitted an administrative appeal dated May 8, 2026, to OIP via FOIA STAR regarding the DEA’s failure to conduct a reasonable search (the “DEA Appeal”). A true and correct copy of the DEA Appeal, without exhibits, is attached as **Exhibit 15**.

48. On May 12, 2026, Plaintiff received via email a letter from OIP dated May 11, 2026, acknowledging receipt of the DEA Appeal and assigning it tracking number A-2026-01388. A true and correct copy of this letter is attached as **Exhibit 16**.

49. As of the date of the filing of this Complaint, it has been approximately 115 calendar days and 80 business days since Plaintiff submitted the DEA Appeal.

50. As of the date of the filing of this Complaint, Plaintiff has received no further communications from OIP regarding the DEA Appeal.

The EOUSA Request

51. On April 15, 2026, Plaintiff submitted a FOIA request to the EOUSA via FOIA.gov (the “EOUSA Request”). A true and correct copy of the EOUSA Request is attached hereto as **Exhibit 17** and is incorporated by reference.

52. The EOUSA Request sought:

- All warrants served during the Glass House Raids.
- The signed affidavits and applications submitted to establish probable cause for warrants served during the Glass House Raids.
- The “Return” or “Inventory” filed with the court by federal agents following the execution of warrants served during the Glass House Raids, documenting any items seized.
- Any electronic communications or correspondence involving First Assistant U.S. Attorney for the Central District of California Bill Essayli that mention or refer to Glass House Farms, Art’s Labor Services or the Glass House Raids, that were sent between July 1, 2025 and July 30, 2025.

Ex. 17.

53. The EOUSA Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 17.

54. On May 29, 2026, Plaintiff received via email a letter from the EOUSA denying the EOUSA Request under FOIA Exemption 7(A). A true and correct copy of the letter is attached hereto as **Exhibit 18**.

55. On June 8, 2026, Plaintiff submitted an administrative appeal to OIP via FOIA STAR challenging the applicability of Exemption 7(A) (the “EOUSA Appeal”). A true and correct copy of the EOUSA Appeal, without exhibits, is attached as **Exhibit 19**.

56. On August 10, 2026, Plaintiff received via FOIA STAR a letter from OIP denying the EOUSA Appeal. A true and correct copy of this letter is attached as **Exhibit 20**.

The Navy Request

57. On April 15, 2026, Plaintiff submitted a FOIA request to the Navy via FOIA.gov (the “Navy Request”). A true and correct copy of the Navy Request is attached hereto as **Exhibit 21** and is incorporated by reference.

58. The Navy Request sought:

- All records that refer to or mention the on-base detentions or presence at Naval Base Ventura County facilities or any other Navy installations of people who were apprehended during the Glass House Raids.
- All records that document how many agents from the Federal Bureau of Investigations, Immigration and Customs Enforcement, Customs and Border Protection or any other federal agency were present at Naval Base Ventura County facilities on July 10, 2025 and July 11, 2025.
- All internal slides, memos, emails or reports that were produced in preparation for the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under [the] Federal Tort Claims Act (FTCA) or any other claim procedures, arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage, Injury or Death” forms submitted to your agency that arose from the Glass House Raids.
- All situation reports, significant incident reports, and use of force reports that were generated during the Glass House Raids or arose from the on-base detention or presence of people apprehended during the Glass House Raids.

Ex. 21.

59. The Navy Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See*

Ex. 21.

60. On June 10, 2026, Plaintiff received via email a letter from the Navy granting in part and denying in part the Navy Request. The letter also stated that additional records were referred to NAVFAC and NORTHCOM for direct response to Plaintiff (the “NAVFAC and NORTHCOM Referral”). A true and correct copy of the letter is attached hereto as **Exhibit 22**.

61. On June 12, 2026, Plaintiff submitted an administrative appeal to the Navy via email regarding the Navy’s failure to conduct a reasonable search (the “Navy Appeal”). A true and correct copy of the Navy Appeal, without exhibits, is attached as **Exhibit 23**.

62. On July 15, 2026, Plaintiff received via email a letter from the Navy denying the Navy Appeal. A true and correct copy of this letter is attached as **Exhibit 24**.

63. As of the date of the filing of this Complaint, it has been approximately 85 calendar days and 59 business days since the Navy issued its determination letter stating that records had been referred to NAVFAC and NORTHCOM.

64. As of the date of the filing of this Complaint, Plaintiff has received no communications from NAVFAC or NORTHCOM regarding the processing of the NAVFAC and NORTHCOM Referral.

The California Guard Request

65. On May 4, 2026, Plaintiff submitted a FOIA request to the California Guard via email (the “California Guard Request”). A true and correct copy of the

California Guard Request is attached hereto as **Exhibit 25** and is incorporated by reference.

66. The California Guard Request sought:

- All records reflecting the total number of National Guard members deployed to or present during the Glass House Raids, including the names of the National Guard units present, and their base of operations.
- All records reflecting the count, make, and model of all terrestrial vehicles and airborne assets (including aircraft and UAS/drones) utilized or present during the Glass House Raids.
- All records reflecting the count and type of all firearms, munitions, and less-lethal devices (e.g., TASERs, chemical agents, kinetic impact projectiles, canines) utilized or present during the Glass House Raids.
- All Use of Force reports, Serious Incident Reports (SIR), and records of any alleged assaults against National Guard members occurring during the Glass House Raids.
- All records reflecting investigations into the conduct of the operations, including but not limited to AR 15-6 reports, arising from the Glass House Raids.
- All internal slides, memos, emails or reports that mention, refer to or constitute legal training, use-of-force training or situational awareness training produced in preparation for the Glass House Raids.
- Any Situation Reports (SITREP) that mention, refer to or arose from the Glass House Raids.
- All audio/visual recordings, including but not limited to body-worn camera (BWC) footage, vehicle-mounted camera footage, aerial surveillance footage, and digital photographs captured by any federal agency during the Glass House Raids.
- All records reflecting any claims brought by property owners or individuals for property damage, personal injury, or death under the Military Claims Act (MCA), the National Guard Claims Act (NGCA), the Federal Tort Claims Act (FTCA) or any other claim procedures, arising from the Glass House Raids, including the number of claims, the damages claimed, and any documentation of adjudication of those claims. This includes all “Standard Form 95 for Claim for Damage,

Injury or Death” forms submitted to your agency that arose from the Glass House Raids.

Ex. 25.

67. The California Guard Request sought a fee benefit as a representative of the news media pursuant to 5 U.S.C. § 552(a)(4)(A) and set forth facts in support thereof. *See* Ex. 25.

68. On May 8, 2026, Plaintiff received via email a letter dated May 5, 2026, assigning tracking number FA-26-0010 to the California Guard Request. A true and correct copy of the letter is attached hereto as **Exhibit 26**.

69. As of the date of the filing of this Complaint, it has been approximately 122 calendar days and 85 business days since Plaintiff submitted the California Guard Request.

70. As of the date of the filing of this Complaint, Plaintiff has received no further communications from the California Guard regarding the California Guard Request.

CAUSES OF ACTION

COUNT I

Violation of FOIA for Failure to Comply with Statutory Deadlines

(Defendants CBP, USMS, NAVFAC, NORTHCOM, and California Guard)

71. Plaintiff re-alleges and incorporates by reference the preceding paragraphs of the Complaint.

72. Defendants CBP, USMS, NAVFAC, NORTHCOM, and California Guard are agencies subject to FOIA.

73. By the CBP, USMS, Navy, and California Guard Requests, Plaintiff properly sought records within the possession, custody or control of Defendants CBP, USMS, Navy, NAVFAC, NORTHCOM, and California Guard.

74. Defendants CBP, USMS, NAVFAC, NORTHCOM, and California Guard failed to make determinations with respect to the Requests and the NAVFAC and NORTHCOM Referral within the timeframe required by FOIA. 5 U.S.C. § 552(a)(6)(A).

75. Defendants' failure to provide determinations with respect to the Requests and the NAVFAC and NORTHCOM Referral within the statutory required timeframe are violations of FOIA.

76. Plaintiff has or is deemed to have exhausted applicable administrative remedies with respect to the Requests and the NAVFAC and NORTHCOM Referral. 5 U.S.C. § 552(a)(6)(A)(ii); *id.* § 552(a)(6)(C)(i).

COUNT II
Violation of FOIA for Failure to Conduct a Sufficient Search
(Defendants FBI, DEA, and the Navy)

77. Plaintiff re-alleges and incorporates by reference the preceding paragraphs of the Complaint.

78. Defendants FBI, DEA, and the Navy are agencies subject to FOIA.

79. By the FBI, DEA, and the Navy Requests, Plaintiff properly sought records within the possession, custody or control of the Defendants.

80. The FBI, DEA, and the Navy Requests complied with all applicable regulations regarding the submission of FOIA requests.

81. Defendants FBI, DEA, and the Navy failed to conduct a sufficient search for responsive records, as required by FOIA. 5 U.S.C. § 552(a)(3).

82. Defendants FBI, DEA, and the Navy's failure to conduct a sufficient search violates Defendants' obligations under FOIA. 5 U.S.C. § 552(a)(3).

83. Plaintiff has or is deemed to have exhausted applicable administrative remedies with respect to the FBI, DEA, and the Navy Requests. 5 U.S.C. § 552(a)(6)(A)(ii); *id.* § 552(a)(6)(C)(i).

COUNT III
Violation of FOIA for Wrongful Withholding of Agency Records
(All Defendants)

84. Plaintiff re-alleges and incorporates by reference the preceding paragraphs of the Complaint.

85. Defendants are agencies subject to FOIA.

86. By the Requests, Plaintiff properly sought records within the possession, custody or control of Defendants.

87. The Requests complied with all applicable regulations regarding the submission of FOIA requests.

88. Defendants ICE, CBP, USMS, FBI, DEA, EOUSA, NAVFAC, NORTHCOM, and California Guard have not released any records or portions thereof in response to the Requests.

89. Defendants CBP, USMS, FBI, DEA, NAVFAC, NORTHCOM, and California Guard have not cited any exemptions to withhold records or portions thereof that are responsive to the Requests.

90. Defendants ICE and EOUSA have not demonstrated that records responsive to the ICE Request or EOUSA Request are exempt under FOIA.

91. Defendants have not identified whether or how release of the records sought by the Requests would foreseeably harm an interest protected by a FOIA exemption or why disclosure is prohibited by law. 5 U.S.C. § 552(a)(8).

92. Defendants have improperly withheld records responsive to the Requests in violation of FOIA. 5 U.S.C. § 552(a)(3)(A).

Requested Relief

WHEREFORE, Plaintiff respectfully requests that this Court:

- (1) Issue a declaration that Defendants' failure to provide a determination with respect to the Requests within the required statutory deadline is a violation of FOIA;
- (2) Order Defendants to complete their search for records responsive to the Requests, and to issue determinations with respect to the Requests;
- (3) Order Defendants to release all non-exempt records or portions thereof responsive to the Requests;
- (4) Issue a declaration that Plaintiff is entitled to disclosure of the records responsive to the Requests;
- (5) Enjoin Defendants from continuing to withhold any and all non-exempt records or portions thereof responsive to the Requests;
- (6) Award Plaintiff reasonable attorney fees and costs incurred in this action under 5 U.S.C. § 552(a)(4)(E); and

(7) Grant such other relief as the Court may deem just and proper.

Dated: September 3, 2026

Respectfully submitted,

/s/ Gunita Singh

Gunita Singh

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