

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SERAPHIN MEDIA, LLC)	
9073 W State Hwy 29)	
Suite 110, #509)	
Liberty Hill, TX 78642)	Civil No. _____
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL BUREAU OF)	
INVESTIGATION)	
935 Pennsylvania Avenue, N.W.)	
Washington, D.C. 20535-0001)	
)	
Defendant.)	
)	

COMPLAINT

Comes now Seraphin Media, LLC (“Plaintiff”), by and through undersigned counsel, and alleges as follows:

1. This is an action under the Freedom of Information Act, 5 U.S.C. § 552, for injunctive and other appropriate relief and seeking the disclosure and release of agency records improperly withheld from Plaintiff by Defendant Federal Bureau of Investigation (“FBI”).

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §1331 and 5 U.S.C. §552(a)(4)(B).

3. Venue lies in this district under 28 U.S.C. §1391(e).

PARTIES

4. Plaintiff Seraphin Media, LLC Texas limited liability company that produces and distributes political commentary and news content via print and broadcast media.

5. Defendant Federal Bureau of Investigation is a law enforcement bureau within the U.S. Department of Justice, a department of the United States Government, and is headquartered at 935 Pennsylvania Avenue, N.W., Washington, D.C. 20535-0001. Defendant has possession, custody, and control of records to which Plaintiff seeks access.

STATEMENT OF FACTS

6. Director Kashyap Patel became the ninth Director of the FBI on February 20, 2025.¹

7. The Director's girlfriend, Alexis Wilkins, has sued several individuals, including Mr. Seraphin, utilizing attorneys who are believed to be the Director's personal attorneys.²

8. The Director has likewise acknowledged his relationship with Ms. Wilkins publicly, calling her his "partner in life." See https://x.com/Kash_Patel/status/1985046122596040717.

9. On November 12, 2025, Plaintiff submitted his FOIA to the FBI for the following records:

All records from February 20, 2025 from Director Patel's government accounts, including but not limited to his email, signal, telegram, Facebook, X (f/k/a Twitter) or other government communications mediums referencing the following topics:

- a. Alexis Wilkins;
- b. Jason C. Greaves;
- c. Jared J. Roberts;
- d. Binnall Law Group, PLLC; and
- e. Kyle Seraphin.

¹ See <https://www.fbi.gov/about/leadership-and-structure/director-patel>.

² See <https://x.com/KyleSeraphin/status/1988311435135644087>; See also See <https://www.newsweek.com/alexis-wilkins-kash-patel-fbi-defamation-sam-parker-kyle-seraphin-elijah-schaffer-11029236>.

See Exhibit A.

10. Mr. Seraphin specifically disclaimed “records from Director Patel’s non-government accounts” and thus limited his FOIA request “to records located on the Director’s government accounts.”

11. On November 21, 2025, the FBI assigned the request No. 1700848-000 and acknowledged the FOIA. *See Exhibit B.*

12. The FBI has yet to provide any responsive records or otherwise claim any exemption.

13. Since the FBI has not alleged that “unusual circumstances” exist pursuant to 5 U.S.C. § 552(a)(4)(A)(viii)(II) and has failed to comply with the time limit set forth in 5 U.S.C. § 552(a)(6)(A)(i), Plaintiff is deemed to have fully exhausted any and all administrative remedies with respect to its FOIA request. *See* 5 U.S.C. § 552(a)(6)(C).

14. Plaintiff is part of the media, seeking information with which to inform and educate the public about the workings of government. Release of the records requested is in the public interest.

15. As of the date of this Complaint, FBI has failed to: (i) to fully comply with the statutory requirements with respect to Plaintiff’s FOIA request; and (ii) produce the requested records or otherwise demonstrate that the requested records are exempt from production.

COUNT I
(Violation of FOIA, 5 U.S.C. §552)

16. Plaintiff realleged the preceding paragraphs as if fully stated herein.

17. Defendant FBI is unlawfully withholding records requested by Plaintiff pursuant to 5 U.S.C. §552.

18. Plaintiff is being irreparably harmed by reason of Defendant's unlawful withholding of records responsive to Plaintiff's FOIA request, and Plaintiff will continue to be irreparably harmed unless the FBI is compelled to conform its conduct to the requirements of the law.

WHEREFORE, Plaintiff respectfully requests that the Court:

- (1) Order Defendant to conduct a search for records responsive to Plaintiff's FOIA request and demonstrate that it employed search methods reasonably likely to lead to the discovery of all records responsive to Plaintiff's FOIA request;
- (2) Order Defendant to produce, by a date certain, any and all non-exempt records responsive to Plaintiff's FOIA request, and a *Vaughn* index of any responsive records withheld under claim of exemption;
- (3) Enjoin Defendant from continuing to withhold any and all non-exempt records responsive to Plaintiff's FOIA request;
- (4) Grant Plaintiff an award of attorneys' fees and other litigation costs reasonably incurred in this action pursuant to 5 U.S.C. §552(a)(4)(E); and
- (5) Grant Plaintiff such other relief as the Court deems just and proper.

Dated: December 15, 2025.

Respectfully Submitted,

/s/Stephen D. Stamboulieh
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