MUSLIM ADVOCATES

September 11, 2026

Sent via SecureRelease Portal

U.S. Department of Homeland Security
Privacy Office
2702 Martin Luther King Jr. Ave SE
Washington, D.C. 20528-065
Email: DHSFOIAPublicLiaison@hq.dhs.gov

RE: FOIA Request: Records Relating to Implementation of Mass Revocation of B1 and B2 Visas

Dear Freedom of Information Officer:

This letter is a request for records ("Request") made pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, *et seq*., and the relevant implementing regulations, *see* 6 C.F.R. § 5.1 *et seq*. The Request is submitted by Muslim Advocates ("MA" or "Requestor"). Requestor seeks the disclosure of records relating to the implementation of the U.S. Department of State's recently announced plan to revoke *en masse* B1 and B2 visas where the visa recipient subsequently sought or is seeking asylum in the United States. Please also refer the requests contained in this letter to any other agency or component agency as appropriate.

Requestor also seeks a fee waiver, pursuant to 5 U.S.C. § 552(a)(4)(A) and 6 C.F.R. § 5.11(k), and expedited processing, pursuant to 5 U.S.C. § 552(a)(6)(E) and 6 C.F.R. § 5.5(e). The justifications for the fee waiver and expedited processing are set out in detail below.

I. Background

Public reporting suggests that the Department of State ("DOS") intends to revoke "B1 and B2 visas issued between 2016 and 2026 whose holders have sought asylum or are now seeking asylum" ("Mass Visa Revocation").[1] The Mass Visa Revocation will be conducted in coordination with the Department of Homeland Security ("DHS").[2] To date, there has been no formal announcement from the State Department, DHS, or any other agency regarding the implementation of this Mass Visa Revocation, nor has any further information been released.

[1] Matthew Lee, *US Set for Largest Mass Visa Revocation in History Targeting Up To 200,000 Foreigners, Officials Say*, Associated Press (Aug. 24, 2026), https://apnews.com/article/trump-rubio-visas-revoke-e9c14fdfd0ada439d2b9d8694e678a46.
[2] *Id.*

II. Records Requested

Muslim Advocates seeks the release of the following records[3] that were prepared, received, transmitted, collected, and/or maintained by DHS and any other agency components thereof. Please construe this as an ongoing FOIA request, so that any records that come into the possession of the agency prior to your final response to this FOIA request should also be considered within the request's scope.

1. All policies, practices, procedures, guidance, instructions, directives, memoranda, communications, notes, and any other records pertaining to the Mass Visa Revocation, its development, and its implementation.

2. Interagency guidance, policies, practices, memoranda, and communications shared between DOS and DHS relating to the processes by which the agencies identify individuals whose visas are, will be, or are likely to be subject to the Mass Visa Revocation.

3. Non-identifying information that reflects country of origin and/or ethnic background of individuals whose visas are, will be, or are likely to be subject to the Mass Visa Revocation.

4. Records describing the processing of this request, including but not limited to records sufficient to identify the search terms used and the search queries conducted; records sufficient to identify the locations and custodians searched; any tracking sheets used to track the processing of this request; and any FOIA questionnaires or certifications completed by individual custodians or components used to determine whether they possess responsive materials or to describe how they conducted searches.

III. Format of Production

Please search for all responsive records regardless of format, medium, or physical characteristics, and including electronic records, *see* 5 U.S.C. § 522(a)(3)(B). Please provide the requested documents in the following format:

[3] "Records" is intended in the broadest possible sense and includes without limitation all records or communications preserved in electronic or written form, including but not limited to correspondence, regulations, directives, documents, data, videotapes, audiotapes, e-mails, faxes, files, guidance, guidelines, standards, evaluations, instructions, analyses, legal and policy memoranda, minutes or notes of meetings and phone calls, memoranda, agreements, notes, orders, policies, procedures, protocols, reports, rules, manuals, technical specifications, cables, text communications between phones or other electronic devices (including, but not limited to, communications sent via SMS or other text, Blackberry Messenger, iMessage, WhatsApp, Signal, G-Chat, or social media direct message), training materials or studies, including records kept in written form, or electronic format on computers and/or other electronic storage devices, electronic communications and/or videotapes, as well as any reproductions thereof that differ in any way from any other reproduction, such as copies containing marginal notations.

- Provided via email or on a CD, DVD, hard drive, or other hardcopy media;
- In a text-searchable, static image format (PDF) in the best quality in the agency's possession;
- Each record in separate, Bates-stamped files;
- "Parent-child" relationships maintained, meaning that the Requestor must be able to identify the attachments with emails;
- Emails should include BCC and any other hidden fields;
- Any data records in native format (i.e., Excel spreadsheets in Excel); and
- With any other metadata preserved.

If you withhold records or parts of records, please provide the justification for the withholding. If it is your position that any portion of the requested records is exempt from disclosure, please provide an index of those records as required under *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), and describe each document claimed as exempt with sufficient specificity "to permit a reasoned judgment as to whether the material is actually exempt under FOIA."[4] Please ensure that the *Vaughn* index "describe[s] each document or portion thereof withheld, and for each withholding . . . discuss[es] the consequences of disclosing the sought-after information."[5] Please also "supply 'a relatively detailed justification, specifically identifying the reasons why a particular exemption is relevant and correlating those claims with the particular part of a withheld document to which they apply.'"[6]

If you withhold portions of a record, please produce all segregable portions. In the event some portions of the requested records are properly exempt from disclosure, please disclose any reasonably segregable non-exempt portions of the requested records. If it is your position that a document contains non-exempt segments, but that those non-exempt segments are so dispersed throughout the document as to make segregation impossible, please state what portion of the document is non-exempt, and how the material is dispersed throughout the document.[7] Please state claims of non-segregability with the same degree of detail as required for claims of exemptions in a *Vaughn* index. If a request is denied in whole, please state specifically that it is not reasonable to segregate portions of the record for release.

IV. Application for Waiver or Limitation of Fees

Muslim Advocates requests that any fees associated with responding to its FOIA request be waived pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) and 6 C.F.R. § 5.11(k). Under these provisions, fees should be waived or reduced if disclosure is: (1) "in the public interest because it is likely to

[4] *Founding Church of Scientology v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).
[5] *King v. U.S. Dep't of Justice*, 830 F.2d 210, 223–24 (D.C. Cir. 1987) (emphasis omitted).
[6] *Id.* at 224 (quoting *Mead Data Central, Inc. v. U.S. Dep't of the Air Force*, 566 F.2d 242, 251 (D.C. Cir. 1977)).
[7] *Mead Data Central*, 566 F.2d at 261.

contribute significantly to public understanding of the operations or activities of the government," and (2) "is not primarily in the commercial interest of the requester." Both conditions are satisfied here. Requestor also requests a waiver or reduction of fees on the ground that it qualifies as a "representative[] of the news media" and the records are not sought for commercial use. *See* 5 U.S.C. § 552(a)(4)(A)(ii)(II); 6 C.F.R. § 5.11(d)(1). A fee waiver would also fulfill Congress's intent in amending the FOIA.[8]

A. Disclosure is in the public interest because it is likely to contribute significantly to the public's understanding of the operations and activities of the government.

Disclosure of the requested records is in the public interest because: (1) the subject of the request "concern[s] identifiable operations or activities of the federal government"; (2) disclosure will be "meaningfully informative about government operations or activities"; (3) disclosure will "contribute to the understanding of a reasonably broad audience of persons interested in the subject;" and (4) the public's understanding of the subject will be enhanced "to a significant extent" by disclosure. 6 C.F.R. § 5.11(k)(2).

First, the subject of this Request concerns an identifiable operation or activity of the federal government: the Mass Visa Revocation.

Second, disclosure of the requested records would be meaningfully informative because "[something] new would be added to the public's understanding" of the government's operations and activities. *Id.* § 5.11(k)(2)(ii). Here, the requested records would contribute significantly to the public's understanding of the United States' operationalization of the Mass Visa Revocation because currently the only information available to the public is that the Mass Visa Revocation is forthcoming and will be conducted by DOS in coordination with DHS. No information related to the development or implementation of this announced government activity is available to the public. This satisfies the fourth factor as well—any records disclosed pursuant to this Request will enhance the public's understanding "to a significant extent" given the complete dearth of information available to the public pertaining to the Mass Visa Revocation. 6 C.F.R. § 5.11(k)(2)(iv).

Finally, there is a reasonably broad audience of persons interested in the government's policy of revoking or restricting visas *en masse*. To start, the 200,000 individuals who may be subject to the Mass Visa Revocation and their families constitute a broad audience of persons interested in the subject of this Request.[9] Furthermore, prior mass visa revocations and restrictions by the current administration have been the subject of litigation and congressional inquiries,

[8] *Judicial Watch, Inc. v. Rossoti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) ("Congress amended FOIA to ensure that it be 'liberally construed in favor of waivers of noncommercial requesters.'").
[9] Lee, *supra* note 1.

evidencing public interest.[10] Requestor also qualifies as a representative of the news media, *see infra* Sec. IV.C, and therefore holds expertise in the immigration policy subject area and maintains both the ability and the intent to effectively convey the information contained in the requested records to the public. *See* 6 C.F.R. § 5.11(k)(2)(iii) (explaining that a representative of the news media is presumed to satisfy the consideration of the "requester's expertise in the subject area as well as [the requester's] ability and intention to effectively convey information to the public").

B. Disclosure is not primarily in the commercial interest of the Requestor.

Muslim Advocates is not filing this request to further a commercial interest. Muslim Advocates is a 501(c)(3) non-profit organization and therefore has no commercial, trade, or profit interest. *See* 6 C.F.R. § 5.11(b)(1). Muslim Advocates works independently and collaboratively with partners across the United States to educate and disclose information to other advocacy organizations and directly impacted or interested communities, while promoting public policy change through litigation, advocacy, and support for community organizing on the ground. Attorneys, noncitizens, and any other interested members of the public may freely obtain information about immigration-related issues through the Requestor's distribution of written materials, and through public and educational appearances. The requested information is sought for the purpose of disseminating it to members of the public at no cost, including through posting it on the Requestor's website and other publications, and not for the purpose of commercial gain.

C. Requestor also qualifies for a fee waiver because it is a representative of the news media and the records are not sought for commercial use.

Requestor is also entitled to a waiver of search fees and review time on the grounds that it qualifies as "representative[s] of the news media" and the records are not sought for commercial use. 5 U.S.C. § 552(a)(4)(A)(ii)(II); 6 C.F.R. § 5.11(d)(1). Muslim Advocates meets the statutory and regulatory definitions of "representative[s] of the news media" because it is an "entity that gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience." 5 U.S.C. § 552(a)(4)(A)(ii)(II); 6 C.F.R. § 5.11(b)(6). *See also Nat'l Sec. Archive v. U.S. Dep't of Def.*, 880 F.2d 1381, 1387 (D.C. Cir. 1989) (finding that an organization that gathers information, exercises editorial discretion in selecting and organizing documents, "devises indices and finding aids," and "distributes the resulting work to the public" is a "representative of the news media" for purposes of the FOIA).

[10] *See, e.g.*, *Presidents' All. on Higher Educ. & Immigr. v. Noem*, 824 F. Supp. 3d 168 (D. Mass. 2026) (lawsuit challenging mass revocation of student visas); *Catholic Legal Immigr. Network, Inc. v. Rubio*, No. 26-cv-00858, 2026 WL 2455099 (S.D.N.Y. Aug. 21, 2026) (lawsuit challenging suspension of visa issuance to nationals of 75 countries); *Jayapal Leads 142 Members in Demanding Answers Regarding the Revocation of Student Visas* (May 1, 2025), https://jayapal.house.gov/2025/05/01/jayapal-leads-142-members-in-demanding-answers-regarding-the-revocation-of-student-visas/.

Requestor has pursued FOIA litigation against many agencies that resulted in the disclosure of previously withheld information, including against DOS and DHS.[11] Courts have found other organizations whose mission, function, publishing, and public education activities are similar in kind to the Requestor's to be "representative[s] of the news media" as well. *Cf. Judicial Watch, Inc. v. U.S. Dep't of Justice*, 133 F. Supp. 2d 53, 53–54 (D.D.C. 2000) (finding Judicial Watch, self-described as a "public interest law firm," a news media requestor); *Elec. Privacy Info. Ctr. v. Dep't of Def.*, 241 F. Supp. 2d 5, 11–12 (D.D.C. 2003) (finding legal advocacy non-profit qualifies as news media requestor).

* * *

In sum, Requestor is entitled to a waiver of fees associated with this Request because disclosure of the requested documents is in the public interest and not primarily in the commercial interest of the Requestor, and because Requestor should be treated as a representative of the news media.

V. Application for Expedited Processing

Muslim Advocates requests expedited processing of this Request pursuant to 5 U.S.C. § 552(a)(6)(E) and 6 C.F.R. § 5.5(e). Requestor is "primarily engaged in disseminating information" and there is a "compelling need" for these records, as defined in the statute and regulation, because there is an "urgency to inform the public concerning actual or alleged Federal Government activity." 5 U.S.C. § 552(a)(6)(E)(v)(II); *cf.* 6 C.F.R. § 5.5(e)(i)(ii). I certify that the following statement is true and correct to the best of my knowledge and belief. *See* 5 U.S.C. § 552(a)(6)(E)(v); 6 C.F.R. § 5.5(e)(3).

A. Requestor is an organization primarily engaged in disseminating information to the public.

Muslim Advocates engages in litigation, policy advocacy, and educational outreach and regularly produces reports, white papers, press releases, and other materials to educate the public on civil rights and social justice matters. Muslim Advocates regularly files FOIA requests and publishes information obtained pursuant to such requests in a digestible, public-facing form. Through these activities, Requestor helps shine a light on government practices that affect the public. Requestor is therefore "primarily engaged in disseminating information." *See, e.g.*, *ACLU*

[11] *See, e.g.*, Fourteenth Joint Status Report, *Muslim Advocates. v. Dep't of Homeland Sec.*, No. 1:17-cv-00813 (D.D.C. Jan. 6, 2020) (describing productions of requested records); Joint Status Report, *Muslim Advocates v. U.S. Dep't of Homeland Sec.*, No. 1:17-cv-00820 (D.D.C. Mar. 6, 2019) (same); Joint Status Report, *Muslim Advocates v. U.S. Dep't of State*, No. 1:18-cv-01546 (D.D.C. Dec. 15, 2022) (explaining that DOS produced the requested information). *See also, e.g.*, Joint Status Report, *Muslim Advocates v. U.S. Dep't of Justice*, No. 1:18-cv-01967 (D.D.C. July 19, 2019) (explaining that both the Department of Justice and Immigration and Customs Enforcement completed productions of records).

v. U.S. Dep't of Just., 321 F. Supp. 2d 24, 29 n.5 (D.D.C. 2004) (finding non-profit public interest group that "gathers information of potential interest to a segment of the public, uses its editorial skills to turn the raw material into a distinct work, and distributes that work to an audience" to be "primarily engaged in disseminating information").

B. The records sought are urgently needed to inform the public about actual or alleged government activity.

Muslim Advocates seeks records that are urgently needed to inform the public about actual or alleged government activity. *See* 5 U.S.C. § 552(a)(6)(E)(v)(II); 6 C.F.R. § 5.5(e)(1)(ii). Up to 200,000 individuals may be subject to the Mass Visa Revocation but the government has provided no information as to how or when this government activity may take place. This Request seeks records that will inform the public about the implementation of a sprawling government activity. Further, attorneys and other services providers need to understand the relevant policies, procedures, and practices to effectively serve and advise the hundreds of thousands of individuals potentially affected by the Mass Visa Revocation. Finally, the Mass Visa Revocation has been the subject of widespread media reporting,[12] which supports a showing of urgent need. *See* 6 C.F.R. § 5.5(e)(3) ("The existence of numerous articles published on a given subject can be helpful to establishing the requirement that there be an 'urgency to inform' the public on the topic.").

VI. Conclusion

Thank you for your prompt attention to this Request. We look forward to your response to our request for expedited processing within ten (10) business days, as required by 5 U.S.C. § 552(a)(6)(E)(ii) and 6 C.F.R. § 5.5(e)(4). Notwithstanding our request for expedited processing, we alternatively look forward to your reply to this request within twenty (20) business days, as required by 5 U.S.C. § 552(a)(6)(A)(i).

[12] *See, e.g.*, Lee, *supra* note 1; Nardine Saad, *US to Revoke Visas of Short-Term Visitors Seeking Asylum*, BBC (Aug. 25, 2026), https://www.bbc.com/news/articles/c9qrg82dvjqo; Sergio Martínez-Beltrán, *Trump Administration Plans to Revoke Up To 200,000 Visas, Official Says*, NPR (Aug. 25, 2026), https://www.npr.org/2026/08/25/nx-s1-5944058/us-largest-mass-visa-revocation-200-000-foreigners; Victoria Craw, *State Dept. to Revoke Tourist, Business Visas for Those Who Claimed Asylum*, Washington Post (Aug. 25, 2026), https://www.washingtonpost.com/immigration/2026/08/25/state-dept-revoke-tourist-business-visas-those-who-claimed-asylum/; Ryan Mancini, *Trump Administration Preparing to Revoke Visas of Up To 200K Foreigners in Largest Mass Visa Revocation Ever*, The Hill (Aug. 24, 2026), https://thehill.com/homenews/administration/6048047-mass-b1-b2-visa-revocations/; *Trump Administration Plans to Revoke B1, B2 Visas of 200,000 Asylum Seekers*, Al Jazeera (Aug. 25, 2026), https://www.aljazeera.com/news/2026/8/25/us-plans-to-revoke-business-tourism-visas-of-200000-asylum-seekers; Eduardo Orbea *et al.*, *How to Know if Your Visa Was Revoked by the U.S. Government*, NBC4 Washington (Aug. 26, 2026), https://www.nbcwashington.com/news/national-international/how-to-know-if-visa-revoked-by-us-government/4146879/; Hunter Caparelli, *What Planned Mass Visa Revocations Could Mean in Upstate New York*, Spectrum News 1 (Aug. 26, 2026), https://spectrumlocalnews.com/nys/buffalo/news/2026/08/26/mass-us-visa-revocation.

MUSLIM ADVOCATES

Please furnish records as soon as they are identified, preferably by email to nargis@muslimadvocates.org. If the records must be sent via U.S. Mail, please send to the following address:

Muslim Advocates
P.O. Box 34440
Washington, D.C., 20043

We reserve the right to appeal a decision to withhold any information, or to deny a waiver of fees.

If you have any questions regarding this request, please contact Nargis Aslami at nargis@muslimadvocates.org or (202) 897-1895. I appreciate your cooperation and look forward to hearing from you.

Sincerely,

Nargis Aslami
Legal Fellow
Muslim Advocates