



May 29, 2025

U.S. Department of Justice
FOIA/PA Mail Referral Unit
Department of Justice
Room 115
LOC Building
Washington, DC 20530-0001
MRUFOIA.Requests@usdoj.gov

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602

U.S. Department of State
Information Access Liaison Office, A/SKS/IAP/IAL
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FOIARequest@state.gov

U.S. Department of Homeland Security
Chief Privacy Officer/Chief FOIA Officer
The Privacy Office
245 Murray Lane SW
STOP-0655
Washington, D.C. 20528-0655

U.S. Immigration & Customs Enforcement
500 12th Street SW, Stop 5009
Washington, DC 20536-5009
Phone: (866) 633-1182

SENT BY EMAIL AND ONLINE AGENCY FORMS

Re: Freedom of Information Act Request

To the Freedom of Information Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), and the Privacy Act, 5 U.S.C. § 552a, by the Center for Constitutional Rights (“CCR”) on behalf of **Mahmoud Khalil** to the U.S. Department of Justice (“DOJ”) and the Federal Bureau of Investigation (“FBI”), the U.S. Department of State (“DOS”), the U.S.

Department of Homeland Security (“DHS”), and U.S. Immigration and Customs Enforcement (“ICE”). We ask that each agency search all appropriate offices, components, and individual custodians likely to have responsive records, including but not limited to: DHS’s Office of Intelligence and Analysis (“I&A”); ICE’s Homeland Security Investigations (“HSI”) Headquarters’ Offices¹ and New York field office; and DOS’s headquarters and New York field office, for any and all records related to Khalil.

Mahmoud Khalil is a lawful permanent resident of Palestinian origin who was active in the Columbia University campus protests against Columbia and U.S. government complicity in Israel’s brutal military assault on the civilian population of Gaza. On March 8, 2025, ICE officers arrested and detained him, and asserted he is removable from this country for no reason other than his constitutionally protected advocacy for Palestinian rights. He is one of a number of international students who have been targeted by a government policy to retaliate – through immigration detention and deportation – against students protesting U.S. complicity in Israel’s ongoing assault on Gaza. Khalil has been in ICE detention in Jena, Louisiana, for over 10 weeks, thousands of miles from his family and legal counsel. He is challenging his unconstitutional detention in federal court and in immigration court.

According to DHS, Khalil, a lawful permanent resident, is removable because of a determination by Secretary of State Marco Rubio that he has “reasonable grounds to believe that Khalil’s presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.” An undated two-page memo that the government provided Mr. Khalil on April 9 explains in a perfunctory manner the basis for the determination, citing information provided by “DHS/ICE/HSI regarding the participation and role[] of . . . Khalil in antisemitic protests and destructive activities” on U.S. campuses.²

Khalil has long been targeted by anti-Palestinian organizations, including individuals and groups who have sought his deportation or later taken credit for his arrest and detention. Days prior to his arrest by ICE, he sought Columbia University protection from these hostile groups, seeing that the groups were calling for the federal government to effectuate his deportation.³ In this FOIA request, Khalil seeks information that would illuminate the reported origins of his targeting and the bases of the Rubio determination. Specifically, he seeks information that would document and expose the reported collaboration between federal officials and private, anti-Palestinian organizations who have identified, doxxed, and reported him and others for purposes of securing the deportation of student activists advocating on behalf of Palestinian human rights.

¹ All appropriate HSI Headquarters Offices listed here should be searched: <https://www.ice.gov/about-ice/hsi/our-offices/hq>.

² Lauren Mascarenhas & Gloria Pazmino, *Newly-released memo from Rubio details government’s only evidence in effort to deport Mahmoud Khalil*, CNN (Apr. 10, 2025), <https://www.cnn.com/2025/04/10/us/mahmoud-khalil-evidence-deadline>.

³ Prem Thakker, *SCOOP: Emails Show Mahmoud Khalil Asked Columbia for Protection a Day Before He Was Detained*, Zeteo (Mar. 10, 2025), <https://zeteo.com/p/scoop-emails-show-mahmoud-khalil-ask-columbia-protection-ice>.

A. Personal Information

The following information should be used in identifying the records requested:

Full Name: Mahmoud Khalil

Date of Birth: [REDACTED]

A-Number: # [REDACTED]

CCR and Mahmoud Khalil also make this request under the Privacy Act, 5 U.S.C. § 552a. Mahmoud Khalil consents to the disclosure pursuant to this request of personal information relating to himself. Appropriate forms signed by Khalil are attached to this request as Exhibits C and D. Note that the signed DOJ form serves as permission for both DOJ and DHS to release records regarding Khalil.

B. Background Information

1. Anti-Palestinian Organizations Target Students and Scholars for Their Protected Speech

For years, anti-Palestinian groups engaged in a broad campaign to target students and other activists, via doxxing and retribution, for their advocacy on behalf of Palestinian human rights. Since at least the 2024 presidential election, these groups have seized upon a perceived opportunity with the incoming Trump administration, targeting noncitizens for doxxing and submitting their names and other identifying information to DHS and DOJ in order to trigger government retaliation. These anti-Palestinian groups, including Betar USA, Canary Mission, Middle East Forum, Documenting Jew Hatred on Campus, Columbia Alumni for Israel, Shirion Collective, Capital Research Center, and CAMERA (hereinafter, “the Groups”) have focused their targeting on Mr. Khalil, among others.

Patterns of arrests and detention by ICE and DHS strongly suggest that these federal agencies are acting at the encouragement of the Groups. The Groups also appear to be coordinating amongst themselves and amplifying each other’s efforts to solicit federal agencies to punish individuals for protesting for Palestinian rights. Finally, these groups often take credit for ICE and DHS’s adverse actions against those they have identified or reported, further corroborating the connection between the Groups’ targeting and the agencies’ punitive actions. The correlation is clear, and not a coincidence: to date, not a single reported visa revocation and detention of an individual based on pro-Palestine activism occurred absent prior doxxing by one of these Groups.

The following are the most prominent groups that have participated in this campaign and that are subject to this FOIA:

- **Betar USA**, known as Betar Worldwide or @Betar_USA on the social media platform X, is a branch of Betar, a century-old Zionist organization whose founder promoted strong Jewish militarism and territorial

expansion.⁴ Revived in June 2023, the group targets pro-Palestine activists and academics using aggressive intimidation tactics including doxxing, vigilante-type action, and violent rhetoric.⁵

- **Canary Mission** is an anonymously-run blacklisting and doxxing website that publishes the personal information of students, professors, and organizations critical of Israel and its policies.⁶ Launched in 2015, the group has a particular focus on U.S. college campuses and its goals are to chill criticism of Israel, intimidate pro-Palestine advocates, and harm those advocates' reputations and job prospects.⁷ Investigative reporting has revealed that the site is funded through an Israeli pass-through organization called Megamot Shalom, and that it is connected to the Israeli Ministry of Strategic Affairs.⁸
- **Middle East Forum** is a right-wing American thinktank that purports to "protect Western values from Middle Eastern threats."⁹ It relies upon its publication, the Middle East Quarterly, and a network of monitoring programs, including Campus Watch, to target individuals and organizations who the group argues are anti-Israel.
- **Documenting Jew Hatred on Campus** is a coalition of pro-Israel Columbia University alumni, faculty, and parents that formed to "pressure academic institutions" by "exposing toxic anti-Israel climate" on their campuses.¹⁰ It is fiscally sponsored by S.A.F.E. Campus. The Group has a page that focuses on the Columbia campus and maintains an archive of students and faculty that singles out non-citizens. **Shai Davidai**, an assistant Columbia Business School professor who is currently suspended from campus for harassing pro-Palestine students, is on the organization's

⁴ *What is Betar US, the group pushing to deport pro-Palestinian students?*, Al Jazeera (Mar. 25, 2025), <https://www.aljazeera.com/news/2025/3/25/what-is-betar-us-the-group-pushing-to-deport-pro-palestinian-students>.

⁵ *Betar: Who is the far-right Jewish-American group calling for "blood in Gaza?"*, Middle E. Eye (Feb. 27, 2025), <https://www.middleeasteye.net/explainers/betar-who-is-far-right-jewish-american-group-blood-gaza>.

⁶ James Bamford, *Who Is Funding Canary Mission? Inside the Doxxing Operation Targeting Anti-Zionist Students and Professors*, The Nation (Dec. 22, 2023), <https://www.thenation.com/article/world/canary-mission-israel-covert-operations/>; Bridge Initiative Team, *Factsheet: Middle East Forum*, The Bridge Initiative (Aug. 14, 2018), <https://bridge.georgetown.edu/research/factsheet-middle-east-forum/>.

⁷ Zack Beauchamp, *This pro-Israel group keeps a blacklist. Now it's taking credit for deportations*, Vox (Apr. 25, 2025), <https://www.vox.com/politics/410125/canary-mission-the-pro-israel-group-taking-credit-for-student-deportation-explained>.

⁸ Bamford, *supra* note 6.

⁹ *About the Middle East Forum*, Middle East Forum, <https://www.meforum.org/about/about-the-middle-east-forum> (last visited May 23, 2025).

¹⁰ *About Us*, Documenting Jew Hatred on Campus, <https://www.documentingjewhatredoncampus.org/about-us> [https://perma.cc/5T9J-7D9H].

advisory committee and features prominently on its website.¹¹ Davidai has frequently posted about Khalil and demanded his deportation.¹²

- **Shirion Collective** is a pro-Israel surveillance and disinformation network that aims to “aggressively track and expose antisemites.”¹³ The group boasts of an AI-surveillance platform and has disseminated information on pro-Palestinian protestors, including Khalil.¹⁴
- **Columbia Alumni for Israel** is a pro-Israel coalition of alumni, professors, and parents that works to identify and punish pro-Palestine student activists.¹⁵ The coalition has a WhatsApp group of over 1,000 members which has served as a hub for its doxxing and harassment campaigns. One of the group’s members is **Victor Muslin**, a technology executive and founder of CU-Monitor, an online platform that tracks pro-Palestinian activity on campus.¹⁶ Muslin also helps maintain a digital archive for Documenting Jew Hatred on Campus, has reported connections to Canary Mission,¹⁷ and has been involved in multiple initiatives over the years seeking to punish and silence criticism of Israel on Columbia University’s campus.¹⁸
- **Capital Research Center** was founded in 1984 by Willa Johnson, the former senior vice president of The Heritage Foundation. **Ryan Mauro**, a senior researcher with Capital Research Center, has authored multiple articles and tweets that have called for Khalil’s deportation and that were

¹¹ Columbia University, Documenting Jew Hatred on Campus, <https://www.documentingjewhatredoncampus.org/participating-schools/columbia-university> [https://perma.cc/LYL9-W8AB].

¹² Michael Wilson, Michael Rothfeld, & Ana Ley, *How a Columbia Student Activist Landed in Federal Detention*, N.Y. Times (Mar. 17, 2025), <https://www.nytimes.com/2025/03/16/nyregion/mahmoud-khalil-columbia-university.html>.

¹³ Christopher Knaus & Ariel Bogle, *Pro-Israel ‘surveillance’ group turning attention to Australia, leaked post shows*, The Guardian (Jan. 29, 2024), <https://www.theguardian.com/media/2024/jan/30/pro-israel-group-shirion-collective-australian-politicians-leaked-texts>.

¹⁴ Jason Wilson, *Revealed: the tech entrepreneur behind a pro-Israel hate network*, The Guardian (June 29, 2024), <https://www.theguardian.com/world/article/2024/jun/29/daniel-linden-shirion-collective-pro-israel-palestine-hate>.

¹⁵ Natasha Lennard & Akela Lacy, *The Columbia Network Pushing Behind the Scenes to Deport Student Protesters*, The Intercept (Feb. 15, 2025), <https://theintercept.com/2025/02/15/columbia-alumni-israel-whatsapp-deport-gaza-protesters/>.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ In a Linktree page at <https://linktr.ee/victormuslin>, Muslin lists predecessor organizations and projects that he has “worked on,” including CU Monitor, an organization that focused on what it calls “Zionophobia” at Columbia University and that purports to bring together alumni, faculty, students, and parents/grandparents, who are concerned by “the unfair treatment of Israel” in academia; <https://cu-monitor.wixsite.com/cumonitor>; FlipYourDiploma, an initiative centered around Columbia University and Barnard College, <https://liberalvalues.wixstudio.com/flipyourdiploma>; and the P.A.I.N. Project, a project that believes that “anti-Israel activity—nowadays often disguised as virulent anti-Zionism—should not be pain-free” and seeks to have it incur a “financial and reputational penalty.” <https://painmanagement1948.wixsite.com/pain/the-project>.

prominently featured in the Government’s filings opposing Khalil’s asylum application.

2. Anti-Palestinian Groups Target Mahmoud Khalil

In January 2025, Canary Mission first created a profile for Mahmoud Khalil on their website.¹⁹ Also in late January, Betar identified Khalil, specifically, as one of its targets for deportation, including him on its “deport list.”²⁰ On January 29, the organization posted on X that ICE is “aware of his home address and whereabouts” and confirmed that they “have provided all his information to multiple contacts.”²¹ The post tagged ICE’s X account.²² Betar wrongly identified Khalil as having a visa when in fact he was a lawful permanent resident.

Targeting of Khalil escalated in March 2025. The week of March 3, days before he was ultimately picked up by ICE, pro-Israel activists reportedly met with members of Congress specifically seeking Khalil’s deportation.²³ **Ross Glick**, who was then the head of Betar said that he discussed Khalil with Sen. John Fetterman and aides to Sens. Ted Cruz and James Lankford who promised to “escalate” the issue.²⁴ Members of Columbia’s board also reportedly shared information about Khalil with government officials.²⁵

On March 6, Canary Mission posted a video on its social media platforms titled “SUSPECTED FOREIGN NATIONAL ALERT,” in which it posted a video of Khalil at a student sit-in, during which he was communicating with Barnard College administrators in his role as a mediator between administrators and student protestors.²⁶ Also on March 6, Documenting Jew Hatred on Campus at Columbia University posted on X tagging Khalil’s Canary Mission profile, and falsely claiming that Khalil has a “foreign student

¹⁹The archived page on the Wayback Machine preserved on January 25, 2025, cited that the last update was made on January 12, 2025. This is the earliest known date for the profile.

https://web.archive.org/web/20250125063714/https://canarymission.org/individual/Mahmoud_Khalil

²⁰ Will Oremus, *A militant Zionist group threatens activists online with a ‘deport list’*, Washington Post (Mar. 29, 2025), <https://www.washingtonpost.com/technology/2025/03/29/zionist-palestinians-deportations-x/>.

²¹ *Id.*

²² Betar Worldwide (@Betar_USA), X (Jan. 29, 2025, 9:52 PM), https://x.com/Betar_USA/status/1884796686020550930 [https://perma.cc/RHH4-TLDR].

²³ See Anna Betts, *Pro-Israel group says it has ‘deportation list’ and has sent ‘thousands’ of names to Trump officials*, The Guardian (Mar. 14, 2025), <https://www.theguardian.com/us-news/2025/mar/14/israel-betar-deportation-list-trump>; Arno Rosenfeld, *Jewish groups target Columbia graduate Mahmoud Khalil – then ICE arrested him*, Forward (Mar. 10, 2025), <https://forward.com/news/703018/mahmoud-khalil-columbia-cuad-ice/>.

²⁴ *Id.*

²⁵ *Id.*

²⁶ Canary Mission (@canarymission), Instagram (Mar. 6, 2025), https://www.instagram.com/reel/DG3FdjiNJ5R/?utm_source=ig_web_copy_link [https://perma.cc/2J3W-T5LU]; Canary Mission (@canarymission), X (Mar. 6, 2025, 2:30 PM), <https://x.com/canarymission/status/1897731409369870762> [https://perma.cc/26FC-X9TC].

status.”²⁷ In a tweet later that day, the group called on Secretary Rubio to revoke Khalil’s visa and deport him,²⁸ and followed up the next day, on March 7, reiterating that call and tagging Rubio’s X account.²⁹ Several accounts, including **David Lederer** and **Shai Davidai**’s, echoed those March 6 and March 7 calls to deport Khalil. These efforts were so alarming that they prompted Khalil to e-mail Columbia University administrators seeking protection. He wrote:

“Since yesterday, I have been subjected to a vicious, coordinated, and dehumanizing doxxing campaign led by Columbia affiliates Shai Davidai and David Lederer who, among others, have labeled me a security threat and called for my deportation.”³⁰

The next day, on March 8, Khalil was arrested and detained by ICE. Tellingly, when ICE agents arrested Khalil, they repeated that same misinformation published by Betar and Documenting Jew Hatred, wrongly stating that his “student visa” was “revoked.”³¹

The day after Khalil was detained, a group called Shirion Collective posted a memorandum on X that it had sent to DHS on January 27, laying out the “legal basis” for Khalil’s “immediate detention and removal.”³²

Another organization that has targeted Khalil is the Capital Research Center, in an effort led by Ryan Mauro. In October 2024, Mauro and the Capital Research Center authored a report³³ that characterized the student protest movement as terrorism-supporting and called on the U.S. government to “Deport terrorism-supporting foreign protesters,” among other things. On March 13, 2025, days after Khalil’s arrest, Mauro published an op-ed smearing Khalil as a “terror threat” and urging officials to consider Mauro’s research to bolster the case for Khalil’s deportation.³⁴ Mauro and the Capital Research Center’s tweets and reports subsequently featured prominently in the Government’s filings in Khalil’s immigration case – by caricaturizing his views and

²⁷ Documenting Jew Hatred on Campus at Columbia U (@CampusJewHate), X (Mar. 6, 2025, 3:34 PM), <https://x.com/CampusJewHate/status/1897747570186744026> [https://perma.cc/DAT8-NAKN].

²⁸ Documenting Jew Hatred on Campus at Columbia U (@CampusJewHate), X (Mar. 6, 2025, 5:46 PM), <https://x.com/CampusJewHate/status/1897780859735797938> [https://perma.cc/N6VB-DHVS].

²⁹ Documenting Jew Hatred on Campus at Columbia U (@CampusJewHate), X (Mar. 7, 2025, 1:40 PM), <https://x.com/CampusJewHate/status/1898081410415837481> [https://perma.cc/TY6W-WM5C].

³⁰ Thakker, *supra* note 3.

³¹ Amended Petition at 6, *Khalil v. Trump*, No. 25-CV-01963 (MEF) (MAH), 2025 WL 1514713 (D.N.J. 2025), https://ccrjustice.org/sites/default/files/attach/2025/03/38_3-13-25_Amended-petition-complaint_w.pdf.

³² Shirion Collective (@ShirionOrg), X (Mar. 10, 2025, 3:33 PM), <https://x.com/ShirionOrg/status/1899181802184425706> [https://perma.cc/7YBB-LCG2].

³³ Ryan Mauro, *Marching Towards Violence*, Capital Research Center, <https://capitalresearch.org/app/uploads/Marching-Toward-Violence-1.pdf>.

³⁴ Ryan Mauro, *15 smoking guns that show Mahmoud Khalil is a terror threat*, The Blaze (March 13, 2025), <https://www.theblaze.com/columns/opinion/15-smoking-guns-that-show-mahmoud-khalil-is-a-terror-threat> [https://perma.cc/3A3E-SZHX].

falsely labeling him antisemitic or violent – as grounds to deport him without the protections of asylum. *See* Exhibit B.

3. Anti-Palestinian Groups and Individuals Target Columbia University Campus in Particular

After the Trump administration announced its plan to deport international students involved in pro-Palestine protests, prominent members of the Columbia University community began publicizing names of individuals they wanted ICE to deport. Specifically, these groups and individuals working with them compiled lists of students who had engaged in Palestine-related advocacy and, upon information and belief, submitted these lists to ICE’s tip line.³⁵

Former Columbia Board of Trustees members reportedly met with members of the Trump administration, “offering information and advice on what demands to make and how to present them.”³⁶ Although Columbia President Claire Shipman denied that existing trustees were engaged in such discussions, she was silent as to whether former board members may have been in communication with the White House.

Another group, Columbia Alumni for Israel, shared flyers advertising a pro-Palestine school-walkout in January with the goal of identifying participating students and targeting them for detention and deportation.³⁷ **Gil Zussman**, the chair of Columbia’s department of electrical engineering and member of the school’s antisemitism task force, is a member of Columbia Alumni for Israel’s WhatsApp group and regularly participates in the group and asks people to archive materials about protestors at Columbia.³⁸ In leaked messages, the group discussed submitting names of individuals believed to be on student visas to DHS. For instance, an alumnus, **Uri Avissar**, who was a member of that group, sent a link to the ICE tip line with the caption “lets [sic] get to work.”³⁹

Documenting Jew Hatred on Campus also has a specific focus on Columbia’s campus, hosting a page dedicated to Columbia University and an extensive archive that compiles pictures and folders of information about Columbia university faculty and students.⁴⁰ Two of their advisory committee’s members have particularly targeted Khalil: Columbia University’s Shai Davidai,⁴¹ and Mark Goldfeder. Mark Goldfeder has posted

³⁵ Lennard & Lacy, *supra* note 15.

³⁶ Andrew Gumbel, *How Columbia University is tearing itself apart to please Trump*, The Observer (Apr. 27, 2025), <https://observer.co.uk/news/international/article/columbia-university-maga>.

³⁷ Lennard & Lacy, *supra* note 15.

³⁸ *Id.*

³⁹ Sarah Huddleston, *In leaked messages, members of ‘Columbia Alumni for Israel’ group chat work to identify, punish pro-Palestinian protesters*, Columbia Spectator (Mar. 5, 2025), <https://www.columbiaspectator.com/news/2025/03/05/in-leaked-messages-members-of-columbia-alumni-for-israel-group-chat-work-to-identify-punish-pro-palestinian-protesters/>.

⁴⁰ DJHC Public Archives, Documenting Jew Hatred on Campus, <https://documentingjewhatredoncampus.getoutline.com/s/93b310d5-95f0-449a-8b9c-8856879b06e8/doc/djhc-public-archives-KtpL54ftyb> [https://perma.cc/2XPP-JSPX].

⁴¹ *See* Wilson et al., *supra* note 12.

extensively on X arguing that the Trump administration's detention and attempted deportation of Khalil for engaging in speech and advocacy is nevertheless constitutional.⁴²

Finally, [REDACTED] **Columbia Aryeh** – a pro-Israel student club at Columbia. Aryeh posted in Columbia Alumni for Israel's WhatsApp group that they were hiring an archivist for Documenting Jew Hatred on campus. That archive – a joint Aryeh and Documenting Jew Hatred on Campus project – lists scores of names and profiles of students and faculty with information that appears to be packaged to provide to university or government authorities. Mahmoud Khalil's "profile" on that database has a "burning" icon that says, "FOREIGN STUDENT ALERT" and highlights Canary Mission's pre-arrest posts calling for him to be deported, as well as Mark Goldfeder's posts about why Khalil should be deported. *See* Exhibit A.

4. Other Cases Indicating Coordination Between the Groups and the U.S. Government

- On January 30, 2025, Betar announced that **Mohsen Mahdawi**, a Palestinian lawful permanent resident and student at Columbia University, was on its "deport list."⁴³ On March 14, Betar named Mahdawi as its next target⁴⁴; and on March 30, Betar stated it had "provided additional information" on Mahdawi "to @ICEgov."⁴⁵ Mahdawi was arrested by ICE on April 14.⁴⁶ Betar posted a video of the arrest that day, claiming that multiple others "are also shortly to be visited by @ICEgov."⁴⁷
- On February 6, 2025, Canary Mission posted a profile of **Rümeysa Öztürk**, a Tufts University doctoral student from Turkey. ICE arrested and detained Öztürk on March 25, 2025. The next day, Betar posted on X

⁴² Mark Goldfeder (@MarkGoldfeder), X (Mar. 10, 2025, 5:51 PM), https://x.com/markgoldfeder/status/1899216476046864543?s=46&t=Bx5udGLO_vNMnFkAgfDd4w [<https://perma.cc/CZ8J-5WUR>]. Goldfeder has also sued Khalil on a theory that mirrors Ryan Mauro and the Capital Research Center's outlandish, conspiratorial theories regarding Khalil. Jonathan Stempel, *Lawsuit says Palestinian advocates at Columbia University further Hamas' propaganda*, Reuters (Mar. 25, 2025), <https://www.reuters.com/world/us/lawsuit-says-palestinian-advocates-columbia-university-further-hamas-propaganda-2025-03-25/>.

⁴³ Betar Worldwide (@Betar_USA), X (Jan. 30, 2025, 4:29 PM), https://x.com/Betar_USA/status/1885077865684754439 [<https://perma.cc/XP7X-E7LF>].

⁴⁴ Betar Worldwide (@Betar_USA), X (Mar. 14, 2025, 2:12 PM), https://x.com/betar_usa/status/1900611049637724488?s=46&t=Bx5udGLO_vNMnFkAgfDd4w [<https://perma.cc/9WLX-H47R>].

⁴⁵ Betar Worldwide (@Betar_USA), X (Mar. 10, 2025, 11:28 PM), https://x.com/betar_usa/status/1899301402851102776?s=46&t=Bx5udGLO_vNMnFkAgfDd4w [<https://perma.cc/TCJ3-AZCS>].

⁴⁶ Ana Ley, Sharon Otterman, & Anvee Bhutani, *He Wanted Peace in the Middle East. Now ICE Wants to Deport Him*, N.Y. Times (Apr. 16, 2025), <https://www.nytimes.com/2025/04/16/nyregion/columbia-activist-mahdawi-ice-palestinian.html>.

⁴⁷ Betar Worldwide (@Betar_USA), X (Apr. 14, 2025, 3:01 PM) https://x.com/Betar_USA/status/1911857260802056591 [<https://perma.cc/56SC-42GC>].

a video of her arrest, writing, “She was on our list.”⁴⁸ The post added that it planned to send ICE a new list the following Monday of 1800 more names, and tagging the ICE X account.⁴⁹ Canary Mission also claimed responsibility, posting on X that “Sources point to her Canary Mission profile as the primary cause.”⁵⁰

- On February 20, 2025, Canary Mission posted a profile of **Momodou Taal**, a Cornell University graduate student and dual citizen of the United Kingdom and Gambia.⁵¹ On March 13, Betar published on X what it called a “deport alert” for Taal, noting his Cornell affiliation and visa status.⁵² Taal’s student visa was revoked soon after, and he was ordered to surrender to ICE on March 21.⁵³ The next day, Canary Mission celebrated ICE’s targeting of Taal for deportation and claimed credit for his exposure.⁵⁴
- On February 24, 2025, Middle East Forum published an article targeting **Dr. Badar Khan Suri**, a Georgetown University postdoctoral fellow and Indian national.⁵⁵ ICE arrested Dr. Khan Suri on March 17 and informed him that his student visa was revoked.⁵⁶ Two days later, Middle East Forum itself linked his arrest to an article in which it targeted Dr. Khan Suri.⁵⁷
- In March 2025, Betar stated that it “provided hundreds of names to the Trump administration of visa holders and naturalized Middle Easterners and foreigners.”⁵⁸ Despite these claims made by Betar, DHS claimed, in a statement, that ICE “is not working with or received any tips through the

⁴⁸ Betar Worldwide (@Betar_USA), X (Mar. 26, 2025, 11:16 PM), https://x.com/Betar_USA/status/1905096635786444949 [https://perma.cc/222U-YBNS].

⁴⁹ *Id.*

⁵⁰ Canary Mission (@canarymission), X (Mar. 27, 2025, 10:16 AM), <https://x.com/canarymission/status/1905262753264046392> [https://perma.cc/4KBE-7TQM].

⁵¹ Canary Mission (@CanaryMission), X (Feb. 20, 2025, 1:00 PM), <https://x.com/canarymission/status/1892635336120971311> [https://perma.cc/V9VT-ZXRB].

⁵² Betar Worldwide (@Betar_USA), X (Mar. 13, 2025, 10:38 AM), https://x.com/betar_usa/status/1900194755050434943 [https://perma.cc/KBC3-2GM6].

⁵³ Stephanie Saul, *ICE Tells a Cornell Student Activist to Turn Himself In*, N.Y. Times (Mar. 21, 2025), <https://www.nytimes.com/2025/03/21/us/politics/trump-cornell-student-ice.html>.

⁵⁴ Canary Mission (@CanaryMission), X (Mar. 22, 2025, 2:47 PM), <https://x.com/canarymission/status/1903518836155957293> [https://perma.cc/QVW5-26ZK].

⁵⁵ Anna Stanley, *For Georgetown Univ. Couple, Terror-Ties Are a Family Affair*, Middle East Forum (Feb. 24, 2025), <https://www.meforum.org/campus-watch/for-georgetown-univ-couple-terror-ties-are-a-family-affair>.

⁵⁶ Jaclyn Diaz, *What we know about the case of detained Georgetown professor Badar Khan Suri*, NPR (Mar. 21, 2025), <https://www.npr.org/2025/03/21/nx-s1-5336173/immigration-georgetown-university-professor>.

⁵⁷ Press Release, *Hamas-Linked Georgetown Academic Faces Deportation Following MEF Report*, Middle East Forum (Mar. 19, 2025), <https://www.meforum.org/press-releases/hamas-linked-georgetown-academic-faces-deportation-following-mef-report>.

⁵⁸ Al Jazeera, *supra* note 4; Betts, *supra* note 6.

ICE Tip Line from the group identified as Betar.”⁵⁹ Nonetheless, Betar published, but has since removed from their website, a “student deport list” that included Mahmoud Khalil, Mohsen Mahdawi, Momodou Taal, Badar Khan Suri, and Rümeyşa Öztürk, among others.⁶⁰ Under each profile was written either “we believe they should be deported” or “Betar is working on deporting [her/him] and here’s why.” The list appears to have been live on the site between April 5–9, 2025.

- **Efe Ercelik** was an undergraduate student at University of Massachusetts Amherst. He was arrested during a protest on campus on November 3, 2023.⁶¹ A few weeks later, Canary Mission created a profile for Ercelik, referencing the arrest. For 16 months after his arrest, despite having traveled on several occasions and pled guilty to a misdemeanor, no action was taken by DHS or ICE. Yet on April 8, 2025, Betar posted an image on X from Ercelik’s Canary Mission profile. Along with the image, the post stated: “We identify Efe Ercelik as one here on a visa and we have submitted his name for deportation. There’s so many of these bastards nationwide he’s an egregious one in Massachusetts, a rotten state.”⁶² On April 9, 2025, just a day after the tweet, the State Department sent a memo to ICE regarding revocation of Ercelik’s visa, effective that same day.⁶³ A federal court ruled on May 8, 2025, that Betar appears to have “exclusively triggered” DHS’ pursuit of Ercelik’s detention and deportation.⁶⁴

The above cases are only those that are known because those targeted were able to obtain attorneys, or because ICE and DHS have taken action against them. It does not capture the unknown number of individuals that have been reported by these Anti-Palestinian groups and that have either opted to self-deport, or are yet to be deported.

C. Request for Information

CCR and Khalil request disclosure of any and all RECORDS⁶⁵ as stated below:

⁵⁹ Oremus, *supra* note 20.

⁶⁰ *Pro-Hamas Students*, Betar US, via Internet Archive Wayback Machine (Apr. 7, 2025), <https://web.archive.org/web/20250407211200/https://betarus.org/students-deport-list/>.

⁶¹ Hannah Feuer, *Betar ‘almost exclusively triggered’ former student’s detention, judge says*, Forward (May 9, 2025), <https://forward.com/fast-forward/719119/betar-angel-kelley-efe-ercelik/>.

⁶² Betar Worldwide (@Betar_USA), X (Apr. 13, 2025, 2:56 PM), https://x.com/Betar_USA/status/1911493733079474423 [https://perma.cc/34XW-JBMP].

⁶³ *Ercelik v. Hyde*, No. 1:25-CV-11007-AK, 2025 WL 1361543, at *12 (D. Mass. May 8, 2025).

⁶⁴ *Id.*

⁶⁵ In this request the term “RECORD(S)” includes, but is not limited to, all Records or communications preserved in electronic (including metadata) or written form, such as correspondences, emails, Signal messages, social media website (Instagram, Facebook, WhatsApp, or others) direct messages, texts, documents, data, videotapes, audio tapes, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other

1. Any RECORDS of communication(s) between any person working for any component, office or division of the DOJ, DOS, DHS, or ICE with any of the following groups or individuals, since January 1, 2025, that references or relates to Mahmoud Khalil. These groups, individuals and accounts⁶⁶ include but are not limited to:
 - a. Betar USA (X: @Betar_USA; Instagram: @betarworldwide)
 - b. Canary Mission (X: @canarymission; Instagram: @canarymission)
 - c. Documenting Jew Hatred on Campus (X: @CampusJewHate; Instagram: @documentingjewhatredoncampus)
 - d. S.A.F.E. Columbia (X: @SafeColumbia; Email: SafeColumbiaU@gmail.com)
 - e. Aryeh at Columbia (Instagram: @ColumbiaAryeh)
 - f. Columbia Alumni for Israel
 - g. Middle East Forum (X: @meforum; Instagram: @meforum)
 - h. Shirion Collective (X: @ShirionOrg; Instagram: @ShirionCollective)
 - i. Capital Research Center (X: @CapitalResearch; Instagram: @CapitalResearchCenter)
 - j. CAMERA (X: @CAMERAorg)
 - k. Ross Glick (X: @RossGlick1; Email: [REDACTED])
 - l. Shai Davidai (X: @ShaiDavidai; Instagram: @ShaiDavidai)
 - m. David Lederer (X: @DavidLederer6)
 - n. Ryan Mauro (X: @RyanMauro; Instagram: @RealRyanMauro)
 - o. Victor Muslin (X: VictorMuslin)
 - p. Mark Goldfeder (X: @MarkGoldfeder; Email: [REDACTED])
 - q. Victor Mendelson⁶⁷
 - r. Uri Avissar
 - s. Gil Zussman (Email: [REDACTED])
 - t. [REDACTED]
2. Any RECORDS of communication(s) between any person working for any component, office or division of the DOJ, DOS, DHS, or ICE with any private groups or individuals listed above, since January 1, 2025, that references or relates to Columbia University;
3. Any RECORDS or data mentioning Mahmoud Khalil or from the above named individuals or groups received via:
 - a. Direct messages or communications on X and other social media platforms

Record of any kind. Without limitation, the records requested include records at any stage of development, whether proposed, draft, pending, interim, final, or otherwise.

⁶⁶ Names and account names and emails may also be used as suggested search terms for agencies to run.

⁶⁷ Mendelson, a prominent member of the Columbia board of trustees, has noted that he is in touch with the White House regarding campus antisemitism. Nick Summers, *How Trump Defeated Columbia*, New York Magazine (May 19, 2025), <https://archive.ph/C59NC>.

- b. Any of the fields which are part of ICE's "Tip Form" here:
<https://www.ice.gov/webform/ice-tip-form>
 - c. Any fields or parts of the DOJ complaint form:
<https://www.justice.gov/action-center/report-crime-or-submit-complaint>
4. Any RECORDS or communications between DOJ, DOS, DHS, and/or ICE officials and the offices of Sens. Fetterman, Cruz, and Langford and Secretary Marco Rubio and/or their staff between November 5, 2024, and April 1, 2025.

D. Format of Production

With respect to the form of production, see 5 U.S.C. § 522(a)(3)(B). Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records. Please provide the requested document in the following format:

- In PDF format wherever possible;
- Not password-protected;
- Each page Bates-numbered chronologically;
- Electronically searchable text wherever possible;
- "Parent-child" relationships maintained, meaning that the requestor must be able to identify the attachments with emails;
- Any data records in native format (*i.e.*, Excel spreadsheets in Excel);
- Emails should include BCC and any other hidden fields;
- With any other metadata preserved.

E. Requester

The Center for Constitutional Rights ("CCR") is a non-profit, public interest legal and advocacy organization that engages in the fields of civil and international human rights. CCR's diverse issue areas include litigation and advocacy around immigration, as well as racial and ethnic profiling. One of CCR's primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current immigration law issues, and other similar materials for public dissemination. These and other materials are available through CCR's Development, Communications, and Advocacy Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which CCR works. CCR staff members often serve as sources for journalists and media outlets, including on issues related to racial justice, racial discrimination, and immigrant rights. In addition, CCR regularly issues press releases, has an active social media presence with thousands of followers, and also issues regular email updates sent to over 50,000 supporters about developments and news pertaining to CCR's work.

F. Request for Fee Waiver

CCR, along with Khalil, is entitled to a fee waiver pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) on the grounds that "disclosure of the requested records is in the public interest because it is likely to contribute significantly to the public understanding

of the activities or operations of the government and is not primarily in the commercial interest of the requester.” *Id.* § 552(a)(4)(A)(iii). CCR meets the requirements for a fee waiver because the subject of the request concerns the operations or activities of the government, the disclosure of the information is likely to contribute to a significant public understanding of government operations or activities, the Requesters’ primary interest is in disclosure, and they have no commercial interest in the information. *See* 6 C.F.R. § 5.11(b); 22 C.F.R. § 171.16(a); 28 C.F.R. § 16.10(k).

As described above, CCR is a non-profit organization dedicated to educating the public and advocating for civil rights, human rights, and immigrant rights, and have undertaken this work in the public interest and not for any private commercial interest. Similarly, the primary purpose of this FOIA request is to obtain information to further the public’s understanding of how federal agencies have conducted surveillance of First Amendment-protected organizing, and the role that private, anti-Palestine groups have played in identifying, doxxing, and reporting Khalil, an outspoken student advocate, to trigger adverse U.S. government action. Access to this information is crucial for CCR, and the communities we serve, to evaluate government procedures and actions, as well as their potential detrimental effects.

CCR has no commercial interest in the requested information. Disclosure in this case, therefore, meets the statutory criteria, and a fee waiver would fulfill Congress’ legislative intent in amending FOIA. *See Judicial Watch Inc. v. Rossotti*, 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.’”) (citing *McClellan Ecological Seepage Situation v. Carlucci*, 835 F.2d 1282, 1284 (9th Cir. 1987)).

In the alternative, if no fee waiver is granted and the fees exceed \$250.00, please contact CCR to obtain consent to incur additional fees. Processing fees should be limited pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) (“[F]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media.”).

G. Expedited Processing

CCR is entitled to expedited processing of this request because there is a “compelling need” for the information. 5 U.S.C. § 552(a)(6)(E)(i)(I). A “compelling need” is established when there exists an “urgency to inform the public about an actual or alleged Federal Government activity,” when the requester is a “person primarily engaged in disseminating information.” *See* 6 C.F.R. § 5.5(d)(ii); 22 CFR § 171.11(f); 28 C.F.R. § 16.5(e)(ii).

As described in Part E above, CCR is significantly engaged in disseminating information and community advocacy in support of fundamental civil rights and the rule of law, and has a proven track-record of compiling and disseminating information and reports to the public about government functions and activities. Furthermore, CCR will also disseminate any records released to its broad membership base for no cost.

In addition, the agencies grant expedited processing where the subject of the request is a “matter of widespread and exceptional media interest in which there exist possible questions about the government’s integrity that affect public confidence.” 28 C.F.R. § 16.5(e)(iv). Khalil’s case has garnered a significant amount of public attention and media interest, and widespread criticism of the government’s actions. The role of these private groups in particular has garnered significant public scrutiny. In a democracy the ability to speak freely and take public actions with others should not be impeded by the government. Khalil, as well as CCR, has the right to know what federal agencies have done in terms of monitoring his actions as an individual, and how private organizations have contributed to his arrest, detention, and attempted deportation. The more information we have, and the sooner we obtain it, the more fully Khalil and similarly situated student activists can understand the ongoing threats to their freedom, including the threat of detention and deportation, for exercising their bedrock constitutional rights.

Conclusion

CCR expects a determination of this request by each agency for records within 20 days, as provided by statute. *See* 5 U.S.C. § 552(a)(6)(A)(i).

If our request is denied, in whole or in part, we ask that each agency justify all deletions by reference to specific exemptions to FOIA. We also expect each agency to release all segregable portions of otherwise exempt material. CCR reserves the right to appeal each agency’s decision to withhold any information.

Thank you for your prompt attention to this matter. Please furnish all applicable records to: **Ian Head, Center for Constitutional Rights, at ihead@ccrjustice.org (preferred)** or by mail at Ian Head, Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, NY 10012.

I certify that the above information is true and correct to the best of my knowledge.



Ian Head
Open Records Manager
Center for Constitutional Rights
ihead@ccrjustice.org