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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA
TUCSON DIVISION

Arizona Student DOE #3 – 13,

Plaintiffs,

v.

Donald J. Trump, in his official capacity,
President of the United States of America;

John Cantu, in his official capacity as ICE
Enforcement and Removal Operations Phoenix
Field Office Director;

Todd M. Lyons, in his official capacity, Acting
Director, Immigration and Customs Enforcement,
U.S. Department of Homeland Security; and

Kristi Noem, in her official capacity, Secretary,
U.S. Department of Homeland Security,

Defendants.

Case No.

**COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

Request for Declaratory and
Injunctive Relief

INTRODUCTION

1
2 1. Plaintiffs are students in lawful F-1 status who are pursuing an undergraduate
3 or graduate degree. They are eleven of hundreds, if not more, F-1 students nationwide
4 whose SEVIS record has been abruptly and unlawfully terminated by the U.S.
5 Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement
6 (ICE) in the past two weeks, in an attempt to strip them of their ability to lawfully remain
7 in the United States. On information and belief, this policy appears to be primarily
8 targeting African, Arab, Middle Eastern, Muslim, and Asian students.
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11 2. The Student and Exchange Visitor Information Systems (SEVIS) is a
12 government database that tracks international students’ compliance with their F-1 status.
13 ICE, through the Student and Exchange Visitor Program (SEVP), uses SEVIS to monitor
14 student status. Between approximately March 25, 2025, and April 10, 2025, SEVP
15 terminated Plaintiffs’ SEVIS records and marked Plaintiffs as “Otherwise failing to
16 maintain status – Individual identified in criminal records check and/or has had their visa
17 revoked.”
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20 3. Many of the hundreds of students who have had their SEVIS record terminated
21 have been notified by the U.S. Department of State (DOS) that their visa has been
22 revoked.¹ Plaintiffs were notified between approximately March 25, 2025, and April 8,
23 2025, that their visas were revoked. In practical terms, however, whether Plaintiffs’ visas
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27 ¹ See Binkley, Collin, Annie Ma, and Makiya Seminera, *Federal officials are*
28 *quietly terminating the legal residency of some international college students*, Associated
Press, April 4, 2025, <https://apnews.com/article/college-international-student-f1-visa-ice-trump-7a1d186c06a5fdb2f64506dcf208105a>.

1 have been revoked makes little difference here.

2 4. ICE takes the position that the termination of a SEVIS record effectively ends
3 F-1 student status. Even when a visa is revoked, however, ICE is not authorized to
4 terminate Plaintiff's student status. The grounds cited by ICE in the SEVIS terminations
5 do not provide legal authority to terminate Plaintiffs' SEVIS record. An F-1 visa only
6 controls a student's ability to enter the country, not their continued lawful presence once
7 admitted. Plaintiffs have been in full compliance with the terms of their F-1 status and
8 have not engaged in any conduct that would warrant termination of their status.
9

10 5. Rather, ICE's policy of unlawfully terminating SEVIS records—whether in
11 conjunction with F-1 visa revocations or not—appears to be designed to coerce students,
12 including Plaintiffs, into abandoning their studies or post-graduate employment and
13 “self-deporting” despite not violating their status. For example, on March 5, 2025, DOS
14 informed a graduate student at Columbia University, Ranjani Srinivasan, that her F-1
15 student visa had been cancelled, with her SEVIS subsequently terminated.² On March
16 14, 2025, Secretary of Homeland Security Kristi Noem issued a post on X, accompanied
17 by a video of Ranjani Srinivasan: “I’m glad to see one of the Columbia University
18 terrorist sympathizers use the CBP Home app to self deport.”³
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23 6. Other students who have had their F-1 visa revoked and/or SEVIS record
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26 ² Luis Ferre-Sadurni & Hamed Aleaziz, *How a Columbia Student Fled to Canada*
27 *After ICE Came Looking for Her*, N.Y. Times (Mar. 15, 2025),
<https://www.nytimes.com/2025/03/15/nyregion/columbia-student-kristinoem-video.html>.

28 ³ Kristi Noem, *X* (Mar. 14, 2025, 11:01 a.m.),
https://x.com/Sec_Noem/status/1900562928849326488.

1 terminated have been arrested and detained, sometimes before even learning their visa
2 had been revoked at all. On information and belief, there is a policy and practice of
3 transferring these individuals to the South—in particular, Louisiana—once detained.
4 There have been several high-profile cases of immigration arrests in New York,
5 Washington D.C., and Boston, in which the government quickly moved the detainee
6 across state lines to detention facilities in Louisiana and Texas.⁴ On information and
7 belief, there are several additional cases of students who have been arrested since their
8 visas were revoked who were initially detained near where they lived, then moved to the
9 South the day before or day of their bond hearing in immigration court.

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11
12 7. If ICE believes a student is deportable for having a revoked visa or any other
13 reason, it has the authority to initiate removal proceedings and make its case in court. It
14 cannot, however, misuse SEVIS to circumvent the law, force students out of status, and
15 drive them out of the country without process. It similarly cannot engage in retaliatory
16 arrests and transfers to further intimidate students into abandoning their studies and
17 fleeing the country to avoid arrest.
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21 ⁴ See, e.g., McKinnon de Kuyper, *Mahmoud Khalil's Lawyers Release Video of His*
22 *Arrest*, N.Y. Times (Mar. 15, 2025),
23 [https://www.nytimes.com/video/us/politics/100000010054472/mahmoud-khalils-](https://www.nytimes.com/video/us/politics/100000010054472/mahmoud-khalils-arrest.html)
24 [arrest.html](https://www.nytimes.com/video/us/politics/100000010054472/mahmoud-khalils-arrest.html) (Mahmoud Khalil, arrested in New York and transferred to Louisiana); “What
25 we know about the Tufts University PhD student detained by federal agents,” CNN (Mar.
26 28, 2025), [https://www.cnn.com/2025/03/27/us/rumeysa-ozturk-detained-what-we-](https://www.cnn.com/2025/03/27/us/rumeysa-ozturk-detained-what-we-know/index.html)
27 [know/index.html](https://www.cnn.com/2025/03/27/us/rumeysa-ozturk-detained-what-we-know/index.html) (Rumeysa Ozturk, arrested in Boston and transferred to Louisiana);
28 Kyle Cheney & Josh Gerstein, *Trump is seeking to deport another academic who is*
legally in the country, lawsuit says, Politico (Mar. 19, 2025),
[https://www.politico.com/news/2025/03/19/trump-deportationgeorgetown-graduate-](https://www.politico.com/news/2025/03/19/trump-deportationgeorgetown-graduate-student-00239754)
[student-00239754](https://www.politico.com/news/2025/03/19/trump-deportationgeorgetown-graduate-student-00239754) (Badar Khan Suri, arrested in Arlington, Virginia and transferred to
Texas).

1 11. Plaintiffs do not challenge an underlying order of removal or actions
2 committed to unreviewable agency discretion. Plaintiffs are challenging Defendants’
3 unlawful termination of their SEVIS and seek to prevent their unlawful arrest as a result
4 of that termination. Plaintiffs are not able to obtain review of their SEVIS revocation
5 before an Immigration Judge. No other forum exists to address these claims.
6

7 12. Applying any statutory provision to curb jurisdiction in this case therefore
8 would deprive Plaintiffs of any effective judicial review of their claims and a “serious
9 constitutional question . . . would arise if a federal statute were construed to deny any
10 judicial forum for a colorable constitutional claim.” *Webster v. Doe*, 486 U.S. 592, 603
11 (1988).
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13
14 **VENUE**

15 13. Venue is properly before this Court pursuant to 28 U.S.C. § 1391(e) because
16 the Defendants are employees or officers of the United States, acting in their official
17 capacity; because a substantial part of the events or omissions giving rise to the claim
18 occurred in the District of Arizona, Tucson Division; because Plaintiffs fall within the
19 jurisdiction of the ICE Phoenix Field Office⁶, which is in the jurisdiction of the District
20 of Arizona; and because Plaintiffs reside in the District of Arizona, and there is no real
21 property involved in this action.
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24 **PARTIES**
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28 ⁶ The ICE Phoenix Field Office’s “area of responsibility” encompasses all of
Arizona. See <https://www.ice.gov/field-office/phoenix-field-office>.

1 14. Plaintiff Arizona Student DOE # 3 (DOE # 3) is an international student
2 currently pursuing a doctoral degree and resides in Pima County, Arizona. Plaintiff seeks
3 to proceed in this action with a pseudonym due to fear of retaliation by Defendants for
4 asserting their rights through this lawsuit, and of harassment or blacklisting by third
5 parties.⁷
6

7 15. Plaintiff Arizona Student DOE # 4 (DOE # 4) is an international student
8 currently pursuing a bachelor's degree and resides in Pima County, Arizona. Plaintiff
9 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
10 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
11 parties.
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13 16. Plaintiff Arizona Student DOE # 5 (DOE # 5) is an international student
14 currently pursuing a master's degree and resides in Maricopa County, Arizona. Plaintiff
15 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
16 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
17 parties.
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19 17. Plaintiff Arizona Student DOE # 6 (DOE # 6) is an international student
20 currently pursuing a bachelor's degree and resides in Maricopa County, Arizona. Plaintiff
21 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
22 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
23 parties.
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⁷ All Plaintiffs will separately file a motion to proceed pseudonymously.

1 18. Plaintiff Arizona Student DOE # 7 (DOE # 7) is an international student
2 currently pursuing post-graduate employment through Optional Practical Training (OPT)
3 and resides in Maricopa County, Arizona. Plaintiff seeks to proceed in this action with a
4 pseudonym due to fear of retaliation by Defendants for asserting their rights through this
5 lawsuit, and of harassment or blacklisting by third parties.
6

7 19. Plaintiff Arizona Student DOE # 8 (DOE # 8) is an international student
8 currently pursuing a bachelor's degree and resides in Maricopa County, Arizona. Plaintiff
9 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
10 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
11 parties.
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13 20. Plaintiff Arizona Student DOE # 9 (DOE # 9) is an international student
14 currently pursuing a bachelor's degree and resides in Maricopa County, Arizona. Plaintiff
15 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
16 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
17 parties.
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19 21. Plaintiff Arizona Student DOE # 10 (DOE # 10) is an international student
20 currently pursuing a bachelor's degree and resides in Maricopa County, Arizona. Plaintiff
21 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
22 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
23 parties.
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25 22. Plaintiff Arizona Student DOE # 11 (DOE # 11) is an international student
26 currently pursuing master's degree and resides in Maricopa County, Arizona. Plaintiff
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1 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
2 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
3 parties.

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5 23. Plaintiff Arizona Student DOE # 12 (DOE # 12) is an international student
6 currently pursuing a master's degree and resides in Maricopa County, Arizona. Plaintiff
7 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
8 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
9 parties.
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11 24. Plaintiff Arizona Student DOE # 13 (DOE # 13) is an international student
12 currently pursuing a master's degree and resides in Maricopa County, Arizona. Plaintiff
13 seeks to proceed in this action with a pseudonym due to fear of retaliation by Defendants
14 for asserting their rights through this lawsuit, and of harassment or blacklisting by third
15 parties.
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18 25. Defendant DONALD J. TRUMP is named in his official capacity as the
19 President of the United States of America. In this capacity, he is responsible for the
20 policies and actions of the executive branch, including the U.S. Department of State and
21 U.S. Department of Homeland Security.
22

23 26. Defendant JOHN CANTU is the Field Office Director of ICE, in Phoenix,
24 Arizona, and is named in his official capacity. ICE is the component of the DHS that is
25 responsible for detaining and removing noncitizens according to immigration law and
26 oversees custody determinations. In his official capacity, he is responsible for the
27 enforcement of the immigration laws in Arizona, including against Plaintiffs. ICE is
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1 responsible for the termination of Plaintiffs' SEVIS record.

2 27. Defendant TODD M. LYONS is the Acting Director of ICE and is named in
3 his official capacity. Among other things, ICE is responsible for the administration and
4 enforcement of the immigration laws, including the removal of noncitizens.
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6 28. Defendant KRISTI NOEM is the Secretary of the DHS and is named in her
7 official capacity. DHS is the federal agency encompassing ICE, which is responsible for
8 the administration and enforcement of the INA and all other laws relating to the
9 immigration of noncitizens. In her capacity as Secretary, Defendant Noem has
10 responsibility for the administration and enforcement of the immigration and
11 naturalization laws pursuant to section 402 of the Homeland Security Act of 2002, 107
12 Pub. L. No. 296, 116 Stat. 2135 (Nov. 25, 2002); *see also* 8 U.S.C. § 1103(a).
13
14

15 **LEGAL BACKGROUND**

16 29. A nonimmigrant visa controls a noncitizen's admission into the United States,
17 not their continued stay. Congress established a statutory basis for student visas under 8
18 U.S.C. § 1101(a)(15)(F)(i), requiring that a noncitizen engage in a full course of study to
19 maintain nonimmigrant status. Once admitted in F-1 status, a student is granted
20 permission to remain in the United States for the duration of status (annotated as D/S) as
21 long as they continue to meet the requirements established by the regulations governing
22 their visa classification in 8 C.F.R. § 214.2(f), such as maintaining a full course of study
23 and avoiding unauthorized employment.
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27 30. SEVIS is a centralized database maintained by the SEVP within ICE used to
28 manage information on nonimmigrant students and exchange visitors and track their

1 compliance with terms of their status. Under 8 C.F.R. § 214.3(g)(2), Designated School
2 Officials (DSOs) must report through SEVIS to SEVP when a student fails to maintain
3 status. SEVIS termination is governed by SEVP policy and regulations.⁸ Termination can
4 only be based on a student’s failure to maintain status.⁹

6 31. DHS regulations distinguish between two separate ways a student may fall out
7 of status: (1) a student who “fails to maintain status,” and (2) an agency-initiated
8 “termination of status.”

10 32. The first category, failure to maintain status, involves circumstances where a
11 student voluntarily or inadvertently falls out of compliance with the F-1 visa
12 requirements—for example, by failing to maintain a full course of study, engaging in
13 unauthorized employment, or other violations of their status requirements under 8 C.F.R.
14 § 214.2(f). In addition, 8 C.F.R. §§ 214.1(e)–(g) outlines specific circumstances where
15 certain conduct by any nonimmigrant visa holder, such as engaging in unauthorized
16 employment, providing false information to DHS, or being convicted of a crime of
17 violence with a potential sentence of more than a year, “constitutes a failure to maintain
18 status.”

21 33. With the respect to the crime of violence category, 8 C.F.R. § 214.1(g) sets
22 forth that a nonimmigrant’s conviction “for a crime of violence for which a sentence of
23 more than one year imprisonment may be imposed (regardless of whether such sentence
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26 ⁸ See *SEVIS Termination Reasons*, DHS Study in the States, (last visited Apr. 6,
27 2025), <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/termination-reasons>.

28 ⁹ See *id.*

1 is in fact imposed) constitutes a failure to maintain status . . .” Minor misdemeanor
2 offenses do not meet this threshold for termination based on criminal history. The
3 Supreme Court of the United States has held that a crime of violence “means ‘an offense
4 that has as an element the use, attempted use, or threatened use of physical force against
5 the person or property of another.’” *See, e.g., Borden v. United States*, 593 U.S. 420, 427
6 (2021).
7

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9 34. The second category, termination of status by ICE, can occur only under the
10 limited circumstances set forth in 8 C.F.R. § 214.1(d), which only permits ICE to
11 terminate status when: (1) a previously granted waiver under INA § 212(d)(3) or (4) [8
12 U.S.C. § 1182(d)(3) or (4)] is revoked; (2) a private bill to confer lawful permanent
13 residence is introduced in Congress; or (3) ICE publishes a notification in the Federal
14 Register identifying national security, diplomatic, or public safety reasons for
15 termination. ICE cannot otherwise unilaterally terminate nonimmigrant status.¹⁰
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18 35. Accordingly, the revocation of a visa does not constitute failure to maintain
19 status and cannot therefore be a basis for SEVIS termination. If a visa is revoked prior to
20 the student’s arrival to the United States, then a student may not enter the country, and
21 the SEVIS record is terminated. However, the SEVIS record may not be terminated as a
22 result of a visa revocation *after* a student has been admitted into the United States,
23 because the student is permitted to continue the authorized course of study.¹¹
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27 ¹⁰ *See Jie Fang v. Dir. United States Immigr. & Customs Enft.*, 935 F.3d 172, 185 n.
100 (3d Cir. 2019).

28 ¹¹ ICE Policy Guidance 1004-04 –Visa Revocations (June 7, 2010),
https://www.ice.gov/doclib/sevis/pdf/visa_revocations_1004_04.pdf

1 36. ICE’s own guidance confirms that “[v]isa revocation is not, in itself, a cause
2 for termination of the student’s SEVIS record.”¹² Rather, if the visa is revoked, the
3 student is permitted to pursue their course of study in school, but upon departure, the
4 SEVIS record is terminated and the student must obtain a new visa from a consulate or
5 embassy abroad before returning to the United States.¹³

7 37. While a visa revocation *can* be charged as a ground of deportability in removal
8 proceedings, deportability can be contested in such proceedings.¹⁴ The immigration judge
9 may dismiss removal proceedings even where a visa is revoked, so long as a student is
10 able to remain in valid status.¹⁵ Only when a final removal order is entered would status
11 be lost. *See* 8 U.S.C. § 1252(a)(1) (General Orders of Removal); 8 C.F.R. § 1241.1 (Final
12 Order of Removal).

15 38. A student who has not violated their F-1 status, even if their visa is revoked,
16 cannot have a SEVIS record terminated based on INA § 237(a)(1)(C)(i) [8 U.S.C. §
17 1227(a)(1)(C)(i)] (failure to maintain status), INA §237(a)(4)(C)(i) [8 U.S.C. §
18 1227(a)(4)(C)(i)] (foreign policy grounds), or any deportability ground for that matter.
19 *See* 8 C.F.R. § 214.1(d) (establishing the three limited circumstances under which DHS
20 can terminate status).

23 39. The immigration courts have no ability to review the SEVIS termination here
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25 ¹² *Id.*

26 ¹³ Guidance Directive 2016-03, 9 FAM 403.11-3 – VISA REVOCATION (Sept. 12,
27 2016), <https://www.aila.org/library/dos-guidance-directive-2016-03-on-visa-revocation>.

28 ¹⁴ *See* 8 USC § 1227(a)(1)(B); 8 U.S.C. § 1201(i) (allowing immigration court
review of visa revocation).

¹⁵ 8 C.F.R. § 1003.18(d)(ii)(B).

1 because the process is collateral to removal.¹⁶ The termination of a SEVIS record
2 constitutes final agency action for purposes of APA review.¹⁷

3 FACTUAL ALLEGATIONS

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5 40. DOE # 3 is currently pursuing a doctoral degree, which is authorized through
6 their F-1 student status, in Pima County, Arizona. They are from a country in the Middle
7 East and are scheduled to earn their doctoral degree and graduate from an Arizona college
8 or university next month. Plaintiff has not engaged in any significant political activity.
9 Plaintiff first came to study in the United States on a student visa in 2019 for a master's
10 program. After completing that program, they arrived in Arizona in 2021 to begin
11 pursuing their doctoral degree at a college or university located in the District of Arizona.
12 Since that time, Plaintiff has complied with all the requirements of their visa and of the
13 educational institution in which they are enrolled. On or about April 10, 2025, Plaintiff
14 received notice from the college or university where they are enrolled that their SEVIS
15 record was terminated. According to the school's officials, the reason listed was that
16 Plaintiff had been identified in a criminal records check. Specifically, Plaintiff was
17 advised that the reason listed for their SEVIS record termination was "Other - Individual
18 identified in criminal records check and/or has had their visa revoked." Plaintiff was
19 informed by school officials that they discovered that Plaintiff's SEVIS account was
20 terminated. Accordingly, and upon information and belief, the school itself did not
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27 ¹⁶ See *Nakka v. United States Citizenship & Immigr. Servs.*, 111 F.4th 995, 1007 (9th
28 Cir. 2024); *Jie Fang v. Dir. United States Immigr. & Customs Enft*, 935 F.3d 172, 183
(3d Cir. 2019).

¹⁷ See *Fang*, 935 F.3d at 185.

1 terminate Plaintiff's SEVIS record. Plaintiff is unaware of the factual basis for the
2 termination of their SEVIS record. Plaintiff was never informed that their student visa
3 was revoked, likely because it expired in 2021. Plaintiff's only criminal history is a minor
4 misdemeanor arrest. Although Plaintiff was charged with the misdemeanor in a court of
5 limited jurisdiction in Pima County, Arizona, they were never convicted because the
6 prosecutor dismissed charge. The dismissed misdemeanor charge does not render
7 Plaintiff inadmissible to or deportable from the United States. Through their F-1 student
8 status, Plaintiff has been authorized for employment through their school, and they
9 lawfully maintained on-campus employment since their first semester of study in 2021.
10 Since Defendants terminated Plaintiff's SEVIS record, their on-campus employment has
11 been terminated, and their entire livelihood is in jeopardy. Since they received notice of
12 their SEVIS termination, Plaintiff has been experiencing high levels of stress and anxiety.
13 They are unsure of what will happen to them, whether the money and effort put into over
14 a decade of higher education will be fruitless, and they fear the effect incarceration or
15 deportation would have on their future.

20 41. DOE # 4 is currently pursuing a bachelor's degree, which is authorized through
21 their F-1 student status, in Pima County, Arizona. They are from a country in Asia and
22 are scheduled to complete their semester in one month. They anticipate graduating from
23 an Arizona college in 2026. Plaintiff has not engaged in any significant political activity.
24 Plaintiff first came to study in the United States on a student visa in 2022; in 2023 they
25 transferred to Arizona to continue pursuing their bachelor's degree at a college or
26 university located in the District of Arizona. Since that time, Plaintiff has complied with
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1 all the requirements of their visa and of the educational institution in which they are
2 enrolled. On or about April 10, 2025, Plaintiff received notice from the college or
3 university where they are enrolled that their SEVIS record was terminated. According to
4 the school's officials, the reason listed was that Plaintiff had been identified in a criminal
5 records check. Specifically, Plaintiff was advised that the reason listed for their SEVIS
6 record termination was "Other – Individual identified in criminal records check and/or
7 has had their visa revoked." Plaintiff was informed by school officials that they
8 discovered that Plaintiff's SEVIS account was terminated. Accordingly, and upon
9 information and belief, the school itself did not terminate Plaintiff's SEVIS record.
10 Plaintiff is unaware of the factual basis for the termination of their SEVIS record.
11 Plaintiff was never informed that their student visa was revoked. Plaintiff's only criminal
12 history is a minor misdemeanor arrest. Although Plaintiff was charged with the
13 misdemeanor in a court of limited jurisdiction in another U.S. State, they were never
14 convicted because the prosecutor either never filed or dismissed the charge. The
15 dismissed misdemeanor charge does not render Plaintiff inadmissible to or deportable
16 from the United States. Since they received notice of their SEVIS termination, Plaintiff
17 has been experiencing high levels of stress and anxiety. Plaintiff fears being arrested and
18 detained by Defendants. They are unsure of what will happen to them, and they fear the
19 effect incarceration or deportation would have on their U.S. education or their future.
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26 42. DOE # 5 is currently pursuing a master's degree, which is authorized through
27 their F-1 student status, in Maricopa County, Arizona. They are from a country in South
28 Asia and are scheduled to complete their semester in one month. They anticipate they

1 will earn their master’s degree and graduate from an Arizona college in or about 2027.
2 Plaintiff has not engaged in any significant political activity. Plaintiff first came to study
3 in the United States on a student visa in early 2024 when they arrived in Arizona to begin
4 pursuing their master’s degree at a college or university located in the District of Arizona.
5 Since that time, Plaintiff has complied with all the requirements of their visa and of the
6 educational institution in which they are enrolled. On or about April 3, 2025, Plaintiff
7 received notice from the college or university where they are enrolled that their SEVIS
8 record was terminated. According to the school’s officials, the reason listed was that
9 Plaintiff had been identified in a criminal records check. Specifically, Plaintiff was
10 advised that the reason listed for their SEVIS record termination was “Otherwise failing
11 to maintain status – Individual identified in criminal records check and/or has had their
12 visa revoked.” Plaintiff was informed by school officials that they discovered that
13 Plaintiff’s SEVIS account was terminated. Accordingly, and upon information and
14 belief, the school itself did not terminate Plaintiff’s SEVIS record. Plaintiff is unaware of
15 the factual basis for the termination of their SEVIS record. Plaintiff was informed on the
16 same date that their F-1 visa was revoked. This notification came from the consulate in
17 Plaintiff’s home country. Plaintiff’s only criminal history is a minor misdemeanor arrest.
18 Although Plaintiff was charged with the misdemeanor in a court of limited jurisdiction
19 in Maricopa County, Arizona, they were never convicted because the prosecutor moved
20 to dismiss the charge, and the court did dismiss it. The dismissed misdemeanor charge
21 does not render Plaintiff inadmissible to or deportable from the United States. Since they
22 received notice of their SEVIS termination, Plaintiff has been experiencing high levels
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1 of stress and anxiety. Plaintiff fears being arrested and detained by Defendants. They are
2 unsure of what will happen to them, and they fear the effect incarceration or deportation
3 would have on their U.S. education or their future.

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5 43. DOE # 6 is currently pursuing a bachelor's degree, which is authorized through
6 their F-1 student status, in Maricopa County, Arizona. They are from a country in South
7 Asia and are scheduled to complete their semester in one month. They anticipate earning
8 their bachelor's degree and graduating from an Arizona college or university in 2026.
9 Plaintiff has not engaged in any significant political activity. Plaintiff first came to study
10 in the United States on a student visa in 2022 when they arrived in Arizona to begin
11 pursuing their bachelor's degree at a college or university located in the District of
12 Arizona. Since that time, Plaintiff has complied with all the requirements of their visa
13 and of the educational institution in which they are enrolled. On or about April 3, 2025,
14 Plaintiff received notice from the college or university where they are enrolled that their
15 SEVIS record was terminated. According to the school's officials, the reason listed was
16 that Plaintiff had been identified in a criminal records check. Specifically, Plaintiff was
17 advised that the reason listed for their SEVIS record termination was "OTHERWISE
18 FAILING TO MAINTAIN STATUS – Individual identified in criminal records check
19 and/or has had their visa revoked." Plaintiff was informed by school officials that they
20 discovered that Plaintiff's SEVIS account was terminated. Accordingly, and upon
21 information and belief, the school itself did not terminate Plaintiff's SEVIS record.
22 Plaintiff is unaware of the factual basis for the termination of their SEVIS record.
23 Plaintiff was informed on April 4, 2025, that their F-1 visa was revoked. This notification
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1 came from the consulate in Plaintiff's home country. Plaintiff's only criminal history is
2 a minor misdemeanor arrest. Although Plaintiff was charged with the misdemeanor in a
3 court of limited jurisdiction in Maricopa County, Arizona, they were never convicted
4 because the prosecutor moved to dismiss the charge, and the court did dismiss it. The
5 dismissed misdemeanor charge does not render Plaintiff inadmissible to or deportable
6 from the United States. Through their F-1 student status, Plaintiff has been authorized for
7 employment through their school, and they lawfully maintained on-campus employment
8 since 2023. Since Defendants terminated Plaintiff's SEVIS record, their on-campus
9 employment has been terminated, and their ability to continue working and earning a
10 living is in jeopardy. Plaintiff fears being arrested and detained by Defendants. Plaintiff
11 is uncertain as to whether Defendants might further retaliate against and punish them for
12 continuing to study after their SEVIS record was terminated. Since they received notice
13 of their SEVIS termination, Plaintiff has been experiencing high levels of stress and
14 anxiety. They are unsure of what will happen to them, and they fear the effect
15 incarceration or deportation would have on their future.

20 44. DOE # 7 received a bachelor's and master's degree from an Arizona college
21 or university. They are currently employed through Optional Practical Training (OPT)
22 which is authorized through their F-1 student record, in Maricopa County, Arizona. They
23 are from a country in Asia and are scheduled to complete their OPT in two months.
24 Plaintiff has not engaged in any significant political activity. Plaintiff first came to study
25 in the United States on a student visa in approximately 2016 when they arrived in Arizona
26 to begin pursuing their bachelor's degree. Plaintiff obtained this degree at a college or
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1 university located in the District of Arizona in 2019. Plaintiff returned to the United
2 States in 2022 to begin their master’s degree at a college or university located in the
3 District of Arizona. Since that time, Plaintiff has complied with all the requirements of
4 their visa and of the educational institution in which they are enrolled. On or about April
5 7, 2025, Plaintiff received notice from the college or university where they are enrolled
6 that their SEVIS record was terminated. According to the school’s officials, the reason
7 listed was that Plaintiff had been identified in a criminal records check. Specifically,
8 Plaintiff was advised that the reason listed for their SEVIS record termination was
9 “Otherwise failing to maintain status – Individual identified in criminal records check
10 and/or has had their visa revoked.” Plaintiff was informed by school officials that they
11 discovered that Plaintiff’s SEVIS account was terminated. Accordingly, and upon
12 information and belief, the school itself did not terminate Plaintiff’s SEVIS record.
13 Plaintiff is unaware of the factual basis for the termination of their SEVIS record.
14 Plaintiff was informed on April 9, 2025 that their F-1 visa was revoked. This notification
15 came from the consulate in Plaintiff’s home country. Plaintiff’s only criminal history is
16 a minor misdemeanor arrest. Although Plaintiff was charged with the misdemeanor in a
17 court of limited jurisdiction in Maricopa County, Arizona. They were convicted and
18 received a sentence of fines and fees. The conviction was later set aside. This
19 misdemeanor charge does not render Plaintiff inadmissible to or deportable from the
20 United States. Through their F-1 student status, Plaintiff has been authorized for
21 employment through OPT and has lawfully maintained employment since June of 2024.
22 Since Defendants terminated Plaintiff’s SEVIS record, their OPT employment has been
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1 disrupted, and their ability to continue working and earning a living is in jeopardy.
2 Plaintiff had a conversation with their supervisor, who advised Plaintiff that their
3 employment may be terminated as soon as April 25, 2025 due to the SEVIS termination.
4 The employer has allowed Plaintiff to use paid leave up until that date. Plaintiff fears
5 being arrested and detained by Defendants. Plaintiff is uncertain as to whether
6 Defendants might further retaliate against and punish them for continuing to work after
7 their SEVIS record was terminated, if that was allowed. Since they received notice of
8 their SEVIS termination, Plaintiff has been experiencing high levels of stress and anxiety.
9 They are unsure of what will happen to them, and they fear the effect incarceration or
10 deportation would have on their future.

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14 45. DOE # 8 is currently pursuing a bachelor's degree, which is authorized through
15 their F-1 student status, in Maricopa County, Arizona. They are from a country in South
16 Asia and are scheduled to earn their bachelor's degree and graduate from an Arizona
17 college or university next month. Plaintiff is also authorized to begin their Optional
18 Practical Training (OPT), through their F-1 visa, in less than two months. Plaintiff has an
19 offer of employment for this OPT employment. Plaintiff has not engaged in any
20 significant political activity. Plaintiff first came to study in the United States on a student
21 visa in 2021, when they arrived in Arizona to begin pursuing their bachelor's degree at a
22 college or university located in the District of Arizona. Since that time, Plaintiff has
23 complied with all the requirements of their visa and of the educational institution in which
24 they are enrolled. On or about April 3, 2025, Plaintiff received notice from the college or
25 university where they are enrolled that their SEVIS record was terminated. According to
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1 the school’s officials, the reason listed was that Plaintiff had been identified in a criminal
2 records check. Specifically, Plaintiff was advised that the reason listed for their SEVIS
3 record termination was “Otherwise failing to maintain status – Individual identified in
4 criminal records check and/or has had their visa revoked.” Plaintiff was informed by
5 school officials that they discovered that Plaintiff’s SEVIS account was terminated.
6 Accordingly, and upon information and belief, the school itself did not terminate
7 Plaintiff’s SEVIS record. Plaintiff is unaware of the factual basis for the termination of
8 their SEVIS record. Plaintiff was informed on April 4, 2025, that their F-1 visa was
9 revoked. This notification came from the embassy in Plaintiff’s home country. Plaintiff’s
10 only criminal history is a minor misdemeanor arrest. Although Plaintiff was charged with
11 the misdemeanor in a court of limited jurisdiction in Maricopa County, Arizona, they
12 were never convicted because the prosecutor moved to dismiss the charge, and the court
13 did dismiss it. The dismissed misdemeanor charge does not render Plaintiff inadmissible
14 to or deportable from the United States. Through their F-1 student status, Plaintiff has
15 been authorized for employment through their school, and they have lawfully maintained
16 both on- and off-campus employment since 2021. They have accepted an OPT position
17 set to begin in two months. Since Defendants terminated Plaintiff’s SEVIS record, their
18 on-campus employment has been terminated, their current off-campus through Curricular
19 Practice Training (CPT) is in jeopardy, and their upcoming OPT employment is also at
20 risk of termination. This puts their ability to continue working and earning a living in
21 jeopardy. Since they received notice of their SEVIS termination, Plaintiff has been
22 experiencing high levels of stress and anxiety. They are unsure of what will happen to
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1 them, and they fear the effect incarceration or deportation would have on their future.

2 46. DOE # 9 is currently pursuing a bachelor’s degree, which is authorized through
3 their F-1 student status, in Maricopa County, Arizona. They are from a country in the
4 Middle East and are scheduled to earn their bachelor’s degree and graduate from an
5 Arizona college or university in 2027. Plaintiff has not engaged in any significant
6 political activity. Plaintiff first came to study in the United States on a student visa in
7 2023 when they arrived in Arizona to begin pursuing their bachelor’s degree at a college
8 or university located in the District of Arizona. Since that time, Plaintiff has complied
9 with all the requirements of their visa and of the educational institution in which they are
10 enrolled. On or about March 25, 2025, Plaintiff received notice from the college or
11 university where they are enrolled that their SEVIS record was terminated. According to
12 the school’s officials, the reason listed was that Plaintiff had been identified in a criminal
13 records check. Specifically, Plaintiff was advised that the reason listed for their SEVIS
14 record termination was “OTHER – Individual identified in criminal records check and/or
15 has had their visa revoked.” Plaintiff was informed by school officials that they
16 discovered that Plaintiff’s SEVIS account was terminated. Accordingly, and upon
17 information and belief, the school itself did not terminate Plaintiff’s SEVIS record.
18 Plaintiff is unaware of the factual basis for the termination of their SEVIS record. On or
19 about March 26, 2025, Plaintiff was informed that their student visa was revoked.
20 Plaintiff’s only criminal history is a minor misdemeanor arrest. They were convicted and
21 received a sentence to a fine. This misdemeanor charge does not render Plaintiff
22 inadmissible to or deportable from the United States. Since the cancellation of the SEVIS
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1 record, Plaintiff has received communications from his country that his scholarship to
2 continue his studies is at risk of immediate cancellation, and that he may be liable for any
3 scholarship money received to date. Plaintiff fears being arrested and detained by
4 Defendants. Plaintiff has been experiencing high levels of stress and anxiety. They are
5 unsure of what will happen to them, and they fear the effect incarceration or deportation
6 would have on their future.
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9 47. DOE # 10 is currently pursuing a bachelor's degree, which is authorized
10 through their F-1 student status, in Maricopa County, Arizona. They are from a country
11 in South Asia and are scheduled to earn their bachelor's degree and graduate from an
12 Arizona college or university in 2026. Plaintiff has not engaged in any significant
13 political activity. Plaintiff first came to study in the United States on a student visa in
14 2022 when they arrived in Arizona to begin pursuing their bachelor's degree at a college
15 or university located in the District of Arizona. Since that time, Plaintiff has complied
16 with all the requirements of their visa and of the educational institution in which they are
17 enrolled. On or about April 3, 2025, Plaintiff received notice from the college or
18 university where they are enrolled that their SEVIS record was terminated. According to
19 the school's officials, the reason listed was that Plaintiff had been identified in a criminal
20 records check. Specifically, Plaintiff was advised that the reason listed for their SEVIS
21 record termination was "Otherwise failing to maintain status – Individual identified in
22 criminal records check and/or has had their visa revoked." Plaintiff was informed by
23 school officials that they discovered that Plaintiff's SEVIS account was terminated.
24 Accordingly, and upon information and belief, the school itself did not terminate
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1 Plaintiff's SEVIS record. Plaintiff is unaware of the factual basis for the termination of
2 their SEVIS record. Plaintiff was informed by email, from their embassy, that their visa
3 was revoked on April 4, 2025. Plaintiff's only criminal history is a minor misdemeanor
4 arrest. Although Plaintiff was charged with the misdemeanor in a court of limited
5 jurisdiction in Pima County, Arizona, they were never convicted because the prosecutor
6 dismissed charge. The dismissed misdemeanor charge does not render Plaintiff
7 inadmissible to or deportable from the United States. Plaintiff fears being arrested and
8 detained by Defendants. Since they received notice of their SEVIS termination, Plaintiff
9 has been experiencing high levels of stress and anxiety. They are unsure of what will
10 happen to their education or their future.

14 48. DOE # 11 is currently pursuing a master's degree, which is authorized through
15 their F-1 student status, in Maricopa County, Arizona. They are from a country in South
16 Asia and are scheduled to earn their master's degree and graduate from an Arizona
17 college or university next year. Plaintiff has not engaged in any significant political
18 activity. Plaintiff first came to study in the United States on a student visa in or around
19 2016 and was awarded a bachelor's degree in 2020. They arrived in Arizona in 2024 to
20 begin pursuing their master's degree at a college or university located in the District of
21 Arizona. Since that time, Plaintiff has complied with all the requirements of their visa
22 and of the educational institution in which they are enrolled. On or about April 3, 2025,
23 Plaintiff received notice from the college or university where they are enrolled that their
24 SEVIS record was terminated. According to the school's officials, the reason listed was
25 that Plaintiff had been identified in a criminal records check. Specifically, Plaintiff was
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1 advised that the reason listed for their SEVIS record termination was “OTHER –
2 Individual identified in criminal records check and/or has had their visa revoked.”
3 Plaintiff was informed by school officials that they discovered that Plaintiff’s SEVIS
4 account was terminated. Accordingly, and upon information and belief, the school itself
5 did not terminate Plaintiff’s SEVIS record. Plaintiff is unaware of the factual basis for
6 the termination of their SEVIS record. On the same date, Plaintiff was informed by their
7 embassy that their visa was revoked. Plaintiff’s only criminal history is a minor
8 misdemeanor arrest. Plaintiff was charged many years ago with the misdemeanor in a
9 court of limited jurisdiction in Maricopa County, Arizona, and pled guilty to a single
10 misdemeanor. The single misdemeanor does not render Plaintiff inadmissible to or
11 deportable from the United States. Indeed, the misdemeanor preceded Plaintiff’s
12 application for the F-1 visa to pursue their master’s degree. Through their F-1 student
13 status, Plaintiff has been authorized for employment through their school, and they
14 lawfully maintained on-campus employment since their first semester of study in 2024.
15 Since Defendants terminated Plaintiff’s SEVIS record, their on-campus employment has
16 terminated, and their ability to continue working and earning a living is in jeopardy. Since
17 they received notice of their SEVIS termination, Plaintiff has been experiencing high
18 levels of stress and anxiety. They are unsure of what will happen to them, and they fear
19 the effect incarceration or deportation would have on their future.

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26 49. DOE # 12 is currently pursuing a master’s degree, which is authorized through
27 their F-1 student status, in Maricopa County, Arizona. They are from a country in the
28 Middle East and are scheduled to earn their master’s degree and graduate from an Arizona

1 college or university next month. Plaintiff has not engaged in any significant political
2 activity. Plaintiff first came to study in the United States on a student visa in 2014 when
3 they arrived in Arizona to begin pursuing their bachelor's degree at a college or university
4 located in the District of Arizona. Since completing their bachelor's, Plaintiff has been
5 admitted on an F-1 to pursue their master's at a college or university located in the District
6 of Arizona. Plaintiff has complied with all the requirements of their visa and of the
7 educational institution in which they are enrolled. On or about March 26, 2025, Plaintiff
8 received notice from the college or university where they are enrolled that their SEVIS
9 record was terminated. According to the school's officials, the reason listed was that
10 Plaintiff had been identified in a criminal records check. Specifically, Plaintiff was
11 advised that the reason listed for their SEVIS record termination was "Otherwise failing
12 to maintain status – Student is terminated pursuant to INA Sec. 237(a)(1)(C)(i) and
13 237(a)(4)(C)(i)." Plaintiff was informed by school officials that they discovered that
14 Plaintiff's SEVIS account was terminated. Accordingly, and upon information and
15 belief, the school itself did not terminate Plaintiff's SEVIS record. Plaintiff is unaware of
16 the factual basis for the termination of their SEVIS record. On March 26, 2025, Plaintiff
17 received an email from their embassy notifying them that their visa was revoked.
18 Plaintiff's only criminal history is comprised of minor misdemeanor arrests. Although
19 Plaintiff was charged with the misdemeanors in a court of limited jurisdiction in
20 Maricopa County, Arizona, they were only convicted of one misdemeanor. Neither the
21 dismissed charges nor the single conviction renders Plaintiff inadmissible to or
22 deportable from the United States. Through their F-1 student status, Plaintiff has been
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1 authorized for employment through their school, and they lawfully maintained on-
2 campus employment since 2024. Since Defendants terminated Plaintiff’s SEVIS record,
3 their on-campus employment has been terminated. Since they received notice of their
4 SEVIS termination, Plaintiff has been experiencing high levels of stress and anxiety.
5 They are unsure of what will happen to them, and they fear the effect incarceration or
6 deportation would have on education and their future.
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9 50. DOE # 13 is currently pursuing a master’s degree, which is authorized through
10 their F-1 student status, in Maricopa County, Arizona. They are from a country in South
11 Asia and are scheduled to complete their semester next month. They anticipate graduating
12 with their master’s in or around 2026. Plaintiff has not engaged in any significant political
13 activity. Plaintiff first came to study in the United States on a student visa in 2024 when
14 they arrived in Arizona to begin pursuing their master’s degree at a college or university
15 located in the District of Arizona. Since that time, Plaintiff has complied with all the
16 requirements of their visa and of the educational institution in which they are enrolled.
17 On or about April 5, 2025, Plaintiff received notice from the college or university where
18 they are enrolled that their SEVIS record was terminated. According to the school’s
19 officials, the reason listed was that Plaintiff had been identified in a criminal records
20 check. Specifically, Plaintiff was advised that the reason listed for their SEVIS record
21 termination was “Otherwise failing to maintain status – Individual identified in criminal
22 records check and/or has had their visa revoked.” Plaintiff was informed by school
23 officials that they discovered that Plaintiff’s SEVIS account was terminated.
24 Accordingly, and upon information and belief, the school itself did not terminate
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1 Plaintiff's SEVIS record. Plaintiff is unaware of the factual basis for the termination of
2 their SEVIS record. Plaintiff received email notification from their embassy that their
3 visa was revoked on April 8, 2025. Plaintiff's only criminal history is a minor
4 misdemeanor arrest. Although Plaintiff was charged with the misdemeanor in a court of
5 limited jurisdiction in Pima County, Arizona, they were never convicted because the
6 prosecutor dismissed charge. The dismissed misdemeanor charge does not render
7 Plaintiff inadmissible to or deportable from the United States. Since they received notice
8 of their SEVIS termination, Plaintiff has been experiencing high levels of stress and
9 anxiety. They are unsure of what will happen to them, and they fear the effect
10 incarceration or deportation would have on their education or future.

14 51. As stated above, ICE's en masse SEVIS terminations have created havoc and
15 uncertainty for schools as well. Upon information and belief, Plaintiffs' colleges were
16 not given any advanced warning or further explanation for the termination of Plaintiffs'
17 SEVIS record. Schools are scrambling to respond to these unprecedented actions and
18 determine whether and how they can help their international students.¹⁸

21 52. Intervention by the Court is necessary to remedy Defendants' illegal conduct.

27 ¹⁸ See Liam Knox, *How Trump is Wreaking Havoc on the Student Visa System*, Inside
28 Higher Ed, April 5, 2024, <https://www.insidehighered.com/news/global/international-students-us/2025/04/03/how-trump-wreaking-havoc-student-visa-system>.

CAUSES OF ACTION

FIRST CAUSE OF ACTION

Administrative Procedure Act

(Unauthorized SEVIS Termination)

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53. Plaintiffs incorporate the allegations in the paragraphs above as though fully set forth herein.

54. Under § 706(a) of the APA, final agency action can be set aside if it is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law . . . in excess of statutory jurisdiction, authority, or limitations, or short of statutory right; . . . [or] without observance of procedure required by law.” 5 U.S.C. § 706(2)(A), (C)-(D).

55. Defendants have no statutory or regulatory authority to terminate Plaintiffs’ SEVIS record. This is true even if DOS has revoked Plaintiffs’ F-1 visa. Additionally, nothing in Plaintiffs’ criminal history or other history provides a basis for termination.

56. Therefore, Defendant’s termination of Plaintiffs’ SEVIS record is not in accordance with law, in excess of statutory authority, and without observance of procedure required by law.

SECOND CAUSE OF ACTION

Fifth Amendment

(Procedural Due Process)

57. Plaintiffs incorporate the allegations in the paragraphs above as though fully set forth herein.

1 58. Procedural due process requires that the government be constrained before it
2 acts in a way that deprives individuals of property interests protected under the Due
3 Process Clause of the Fifth Amendment.

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5 59. Once a student is lawfully admitted to the United States in F-1 status and
6 complies with the regulatory requirements of that status, the continued registration of that
7 student in SEVIS is governed by specific and mandatory regulations. Because these
8 regulations impose mandatory constraints on agency action and because SEVIS
9 registration is necessary for a student to remain enrolled as an international student,
10 Plaintiffs have a constitutionally protected property interest in their SEVIS registration.
11 *See ASSE Int'l, Inc. v. Kerry*, 803 F.3d 1059 (9th Cir. 2015) (recognizing protected
12 property interest in participating in exchange visitor program); *Brown v. Holder*, 763 F.3d
13 1141, 1148 (9th Cir. 2014) (recognizing protected property interest in nondiscretionary
14 application for naturalization).
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18 60. Defendants terminated Plaintiffs' SEVIS records based on improper grounds
19 without prior notice and without providing Plaintiffs with an opportunity to respond. The
20 failure to provide notice of the facts that formed the basis for the SEVIS terminations is
21 a violation of due process under the Fifth Amendment.
22

23 **THIRD CAUSE OF ACTION**

24 **Administrative Procedure Act**

25 *(Procedural Due Process)*

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27 61. Plaintiffs incorporate the allegations in the paragraphs above as though fully
28 set forth herein.

1 67. Under § 706(a) of the APA, final agency action can be set aside if it is
2 “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law,”
3 including if it fails to make a rational connection between the facts found and the decision
4 made. 5 U.S.C. § 706(2)(A).
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6 68. Defendants failed to articulate the facts that formed a basis for their decision
7 to terminate Plaintiffs’ SEVIS record in violation of the APA, let alone any rational
8 connection between the facts found and the decision made.
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10 69. Defendants’ action is therefore arbitrary and capricious.

11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiffs pray that this Court grant the following relief:

- 13
- 14 (1) Assume jurisdiction over this matter;
 - 15 (2) Declare that the termination of Plaintiffs’ SEVIS record was unlawful;
 - 16 (3) Vacate and set aside ICE’s termination of Plaintiffs’ SEVIS record;
 - 17 (4) Order that Defendants restore Plaintiffs’ SEVIS record and record;
 - 18 (5) Enjoin Defendants from taking any enforcement action against Plaintiffs
19 arising directly or indirectly from their misdemeanor conviction, the
20 unlawful termination of their SEVIS, or the potential unlawful revocation of
21 their F-1 visa which may have already occurred;
 - 22 (6) Enjoin Defendants from detaining Plaintiffs pending these proceedings;
 - 23 (7) Enjoin Defendants from transferring Plaintiffs away from the jurisdiction of
24 this District pending these proceedings;
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- (8) Enjoin Defendants from removing Plaintiffs from the United States pending these proceedings;
- (9) Award reasonable costs and attorney fees under the Equal Access to Justice Act (EAJA) and/or any other statute or legal authority that authorizes such an award under the particular circumstances of this case; and
- (10) Grant such further relief as the Court deems just and proper.

Dated: April 21, 2025

Respectfully submitted,
s/ Matthew Green
Matthew Green
Jesse Evans-Schroeder
Ami Hutchinson
Attorneys for Plaintiff