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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

MOHAMMADREZA SAGHAFI,
SABA TABATABAEE

[REDACTED]

[REDACTED]

(Prince George's County)

FARID ALINEJAD ALMACHOVAN

[REDACTED]

[REDACTED]

(Prince George's County)

SARINA FAIZY,

[REDACTED]

[REDACTED]

(Montgomery County)

MEHRDAD SHAMSKILANI and
BOSHRA REZVANIAN, on behalf of
themselves and their minor child, A.S.

[REDACTED]

[REDACTED]

SHAHEEN POUYA and SADAF
JAMALZADEH

[REDACTED]

[REDACTED]

Civil Action No. 8:26-cv-100

**COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF AND
PETITION FOR WRIT OF
MANDAMUS**

ALOZAI JAVED

[REDACTED]
[REDACTED]

REZA ALIMOHAMMADI and
AREZOU RAHIMI

[REDACTED]
[REDACTED]

AMIR AHMADI ZAHRANI and
SARAH BINAS

[REDACTED]
[REDACTED]

MAYSAM QADIMI RABBANI and
RAHA RAHMANI

[REDACTED]
[REDACTED]

MEHRDAD ZANDIGO HAR

[REDACTED]
[REDACTED]

SHAHROKH PAKTINAT and
TARKAN GHASEMINEJAD
DEHKORDI

[REDACTED]
[REDACTED]

KAYHAN BEHDIN

[REDACTED]
[REDACTED]

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PEGAH JANDAGHIMEIBODI

[REDACTED]
[REDACTED]

MEHRDAD KHEZRI POUR and MINA
MAHMOODABADI

[REDACTED]
[REDACTED]

MILAD POOLADSANJ and
MEHRNAZ MOTAMED

[REDACTED]
[REDACTED]

REYNALDO AARON MARVEZ
BLANCO and AGUSTINA ROVIRA

[REDACTED]
[REDACTED]

SHAHRAM ARSANGJANG and
ASIYEH BAKHTIYARKAHRIZ, *on
behalf of themselves and their minor
children, O.A. and D.A.*

[REDACTED]
[REDACTED]

MOHAMMADKAZEM MEIDANI and
SEYEDEH PARSHIN SHOJAEI

[REDACTED]
[REDACTED]

MOHAMMAD DEHGHAN ROUZI

[REDACTED]
[REDACTED]

SANAZ NAZARI

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[REDACTED]

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BAHAREH RAHIMI

[REDACTED]

[REDACTED]

MOHSEN FAGHIHINEZHAD and
TAHERE SHAHIDIPOUR

[REDACTED]

[REDACTED]

SEYDALL NASERI

[REDACTED]

[REDACTED]

MORTEZA SALIMI and SAHAR
JOMEHPOUR

[REDACTED]

[REDACTED]

SINA DEHESTANI

[REDACTED]

[REDACTED]

MOSTAFA RAHGOUY and MEHNAZ
TABASSUM

[REDACTED]
[REDACTED]

BEHRAD MONIRI

[REDACTED]
[REDACTED]

SARA HOSEINGHOLIZADE

[REDACTED]
[REDACTED]

YALDA YAZDANI

[REDACTED]
[REDACTED]

AZIN VAKILPOUR and ESHAGH
MOHAMMADYARI

[REDACTED]
[REDACTED]

MARYAM SHAYAN

[REDACTED]
[REDACTED]

BAHAR BAKHSHI

[REDACTED]
[REDACTED]

ARSH HAJ MOHAMAD EBRAHIM
KETABFOROUSH

[REDACTED]
[REDACTED]

RAFI ZAHEDI

[REDACTED]
[REDACTED]

MOHAMMADREZA ALIVAND, *on
behalf of themselves and their minor
child, S.A.*

[REDACTED]
[REDACTED]

HOSNA RASTEGARPOUYANI

[REDACTED]
[REDACTED]

MOHAMMAD RAHIMINEJAT

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[REDACTED]

FISTM EMHAYE TEKLAY

[REDACTED]
[REDACTED]

MOHAMAD ZAMINI

[REDACTED]
[REDACTED]

SABA ASLANI

[REDACTED]
[REDACTED]

MOHAMMAD KHOSRAVIKIA

[REDACTED]
[REDACTED]

NIMA ALAMATSAZ

[REDACTED]
[REDACTED]

ALEXANDER SAAVEDRA MELO

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[REDACTED]

MARJAN AZIN

[REDACTED]
[REDACTED]

NASRIN HAGHIGHINAJAFABADI
and MOHAMMAD ESKANDARI

[REDACTED]
[REDACTED]

SAHAR ROSTAMI

[REDACTED]
[REDACTED]
[REDACTED]

SAMAN RAHMATI

[REDACTED]
[REDACTED]

SINA SHARIATI SAMANI

[REDACTED]
[REDACTED]

FATEMEH MOTTAGHIAN and
MLADEN DJEKIC

[REDACTED]
[REDACTED]

HASAN HADID and FATIMA ABDOU

[REDACTED]
[REDACTED]

ALIREZA SALEMI

[REDACTED]
[REDACTED]

VAHID BARZEGAR

[REDACTED]
[REDACTED]

POORYA MIRKHOSRAVI

[REDACTED]
[REDACTED]

NAZILA RAHIMI
c/o RED EAGLE LAW, L.C.
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Plaintiffs,

vs.

JOSEPH B. EDLOW, *in his official
capacity as Director of U.S. Citizenship
and Immigration Services*
USCIS Office of the Chief Counsel
5900 Capital Gateway Drive
MAILSTOP 2120
Camp Springs, MD
(Prince George's County)

Defendant.

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With this action, 83 Plaintiffs, including Plaintiffs Mehrdad Shamskilani, Boshra Rezvanian, A.S., Farid Alinejad Almachovan, Sarina Faizy, Shaheen Pouya, Sadaf Jamalzadeh, Alosai Javed, Mohammadreza Saghafi, Saba Tabatabaee, Reza Alimohammadi, Arezou Rahimi, Amir Ahmadi Zahrani, Sarah Binas, Maysam Qadimi Rabbani, Raha Rahmani, Mehrdad Zandigozar, Shahrokh Paktinat, Tarkan Ghaseminejad Dehkordi, Kayhan Behdin, Efrem Brhane, Pegah Jandaghimeibodi, Mehrdad Khezri Pour, Mina Mahmoodabadi, Milad Pooladsanj, Mehrnaz Motamed, Reynaldo Aaron Marvez Blanco, Augustina Rovira, Shahram ArsangJang, Asiyeh Bakhtiyarkahriz, O.A., D.A, Mohammadkazem Meidani, Seyedeh Parshin Shojaee, Mohammad Dehghan Rouzi, Sanaz Nazari, Negin Alizadehvandchali, Faridoon Mohammadi, Arman Adibi, Sabiha Tajdari, Mohsen Sadeghi, Bahareh Rahimi, Mohsen Faghihinezhad, Tahere Shahidipour, Seydall Naseri, Morteza Salimi, Sahar Jomehpour, Sina Dehestani, Mostafa Rahgouy, Mehnaz Tabassum, Behrad Moniri, Sara Hoseingholizade, Yalda Yazdani, Azin Vakilpour, Eshagh Mohammadyari, Maryam Shayan, Bahar Bakhshi, Arsh Haj Mohamad Ebrahim Ketabforoush, Rafi Zahedi, MohammadReza Alivand, S.A., Hosna Rastegarpouyani, Mohammad Rahiminejat, Fism Emhaye Teklay, Mohamad Zamini, Saba Aslani, Mohammad Khosravikia, Nima Alamatsaz, Alexander Saavedra Melo, Marjan Azin, Nasrin Haghghinajafabadi, Mohammad Eskandari, Sahar Rostami, Saman Rahmati, Sina Shariati Samani, Hasan Hadid, Fatima Abdou, Fatemeh Mottaghian, Mladen Djekic, Alireza Salemi, Vahid Barzegar, Poorya Mirkhosravi, and Nazila Rahimi (collectively “Plaintiffs”), by and through undersigned counsel, respectfully bring this Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandamus asking the Court to enjoin Defendant Joseph B. Edlow, Director of United States Citizenship and Immigration Services (“USCIS”) (“Defendant” or “Defendant Edlow”), and those acting under him, to cease the application of these two barriers to

the adjudication of their pending Forms I-485, *Application to Register Permanent Residence or Adjust Status* (“Form I-485”):

(1) the section of the December 2, 2025 Policy Memorandum, the subject of which is “Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries.” PM-602-0192 (“**Policy Memorandum I**”), that places “a hold on pending benefit requests for aliens from countries listed in Presidential Proclamation (PP) 10949, *Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats* [“PP 10949”],¹ pending a comprehensive review, regardless of entry date.” Exhibit A, *December 2, 2025 USCIS Policy Memorandum*, at 1, ¶2; and

(2) the section of the January 1, 2026 Policy Memorandum, the subject of which is “Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries.” PM-602-0194. (“**Policy Memorandum II**”) that places “a hold on all pending benefit applications, for aliens listed in Presidential Proclamation (PP) 10998, *Restricting and Limiting the Entry of Foreign Nationals To Protect the Security of the United States* [“PP 10998”],² pending a comprehensive review, regardless of entry date.” Exhibit B, *January 1, 2026 USCIS Policy Memorandum*, at 1, ¶1.³

Further, Plaintiffs ask the Court to compel Defendant, and those acting on his behalf, to adjudicate Plaintiffs’ Forms I-485.

NATURE OF ACTION

1. This is an action to ask the Court to compel the Defendant to cease the application of sections of the Policy Memorandums that place holds on pending immigration benefit requests

¹ Also accessible at: <https://www.whitehouse.gov/presidential-actions/2025/06/restricting-the-entry-of-foreign-nationals-to-protect-the-united-states-from-foreign-terrorists-and-other-national-security-and-public-safety-threats/> (last accessed on January 8, 2026).

² Also accessible at: <https://www.whitehouse.gov/presidential-actions/2025/12/restricting-and-limiting-the-entry-of-foreign-nationals-to-protect-the-security-of-the-united-states/> (last accessed on January 8, 2026).

³ Policy Memorandum I and Policy Memorandum II are collectively referred to as “Policy Memorandums.”

based upon an applicant's nationality, and to take all appropriate action to adjudicate Plaintiffs' Forms I-485 within 30 days.

2. Plaintiffs are 57 citizens of Afghanistan, Eritrea, Iran, Syria, or Venezuela, who each filed a Form I-485 with USCIS, and in some cases, their spouses and children who also filed a Form I-485 based upon their derivative status.⁴ (There are 83 Plaintiffs total.)

3. To date, Plaintiffs have not received decisions on their applications, and now, Defendant, through the Policy Memorandums, has put a hold on adjudications of their applications.

4. Plaintiffs are entitled to decisions on their pending applications. The improper withholding of statutorily mandated adjudications of the pending applications presents ongoing violations of the Administrative Procedures Act ("APA"), 5 U.S.C. § 555 et seq. and § 701 et seq.; the Immigration Nationality Act ("INA") § 245(a) (8 U.S.C. § 1255; 8 C.F.R. § 245.1(a), and the US Constitution, Equal Protection Clause.

5. Plaintiffs' rights are infringed by this withholding of adjudications because it is detrimentally affecting their life and employment opportunities, their ability to travel, and their ability to plan for their future.

6. The Form I-485 applications remain within the jurisdiction of Defendant, who has improperly withheld action, to the extreme detriment of the rights and privileges of the Plaintiffs.

7. Plaintiffs now turn to this Court seeking an order to enjoin the Defendant and those

⁴ Plaintiff Agustina Rovira is citizen of Argentina, but because she is a derivative spouse of primary applicant Plaintiff Reynaldo Aaron Marvez Blanco from Venezuela, Defendant has placed her Form I-485 adjudication on hold as well. Similarly, Plaintiff Mladen Djekic is a citizen of Canada, but because he is a derivative spouse of primary applicant Plaintiff Fatemeh Mottaghian from Iran, he also faces a hold on his Form I-485 adjudication.

acting under him from applying the national origin restrictions of the Policy Memorandums as applied to them, and also, to compel Defendant to take all appropriate action to fulfill their mandatory, non-discretionary duty to adjudicate Plaintiffs' Form I-485 applications.

JURISDICTION

8. This is a civil action brought pursuant to the INA, 8 U.S.C. § 1329 (jurisdiction of the district courts) and 28 U.S.C. § 1331 (federal question jurisdiction) and § 1361 (action to compel an officer of the United States to perform his duty) to redress the deprivation of rights, privileges, and immunities secured to Plaintiffs, by which statutes jurisdiction is conferred, to compel Defendant to perform a duty that Defendant owe to Plaintiffs.

9. Under 28 U.S.C. § 1361, “[t]he district courts shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.” Furthermore, Plaintiffs are challenging Defendant’s authority to refuse to adjudicate Plaintiffs applications and not challenging a decision within the discretion of Defendant. Therefore, jurisdiction exists for this Court to consider whether Defendant has authority to withhold adjudications of the applications.

10. Jurisdiction is also conferred pursuant to 5 U.S.C. §§ 555(b), and § 701, 702 et seq, the APA. The APA requires USCIS to carry out its duties within a reasonable time. 5 U.S.C. § 555(b) provides that “[w]ith due regard for the convenience and necessity of the parties or their representatives and within a reasonable time, each agency shall proceed to conclude a matter presented to it.” USCIS is subject to 5 U.S.C. § 555(b). See *Independence Mining Co., Inc. v. Babbitt*, 105 F.3d 502, 507 (9th Cir. 1997) (citing *Japan Whaling Ass’n v. Am. Cetacean Soc’y*, 478 U.S. 221, 230 n. 4 (1986)). See also *Trudeau v. FTC*, 456 F.3d 178, 185 (D.C. Cir. 2006) (finding that district court has jurisdiction under the APA, in conjunction with 28 U.S.C. § 1331,

to review plaintiff's complaint for declaratory and injunctive relief against federal agency); *Liberty Fund, Inc. v. Chao*, 394 F. Supp. 2d 105, 114 (D.D.C. 2005) ("The Administrative Procedure Act requires an agency to act, within a reasonable time," 5 U.S.C. § 555(b), and authorizes a reviewing court to, compel agency action ... unreasonably delayed," 5 U.S.C. § 706(1).")

11. Numerous federal district courts have ruled that adjudication of a properly filed adjustment of status application, including completion of all necessary background checks, is a purely ministerial, non-discretionary act which the Government is under obligation to perform in a timely manner. See, e.g., *Shahid Khan v. Scharfen*, 2009 U.S. Dist. LEXIS 28948 (N.D. Cal. Apr. 6, 2009); *Nigmadzhanov v. Mueller*, 550 F. Supp. 2d 540 (S.D.N.Y. 2008); *Jones v. Gonzales*, Slip Copy, 2007 U.S. Dist. LEXIS 45012 (S.D. Fla. June 21, 2007) ("[N]o agency responsible for resolving matters of public interest should be free to let those matters pend in perpetuity; otherwise would be to relieve the agency of its Congressionally-mandated duty to the public.")

12. Both the regulations and the INA provide numerous examples of duties owed by USCIS in the adjustment of status process. 8 U.S.C. § 1103 provides that "[t]he Secretary of Homeland Security shall be charged with the administration and enforcement of this Act and all other laws relating to the immigration and naturalization of aliens[.]" (Emphasis added). The Code of Federal Regulations provides that "[e]ach applicant for adjustment of status ... *shall be* interviewed by an immigration officer." 8 C.F.R. § 245.6 (emphasis added). The regulations further provide that "the applicant *shall be* notified of the decision of the director and, if the application is denied, the reasons for the denial." 8 C.F.R. § 245.2(a)(5)(i) (emphasis added). The language of the statute and regulations is mandatory, not discretionary, and the Defendant has a clear duty to adjudicate

the application for adjustment of status pending before them. *See Matter of Sealed Case*, 151 F.3d 1059, 1063 (D.C. Cir. 1998); see also, *First Federal Savings and Loan Association of Durham v. Baker*, 860 F.2d 135, 138 (4th Cir. 1988). As set forth below, the withholding of Plaintiffs' Form I-485 applications is unlawful, and thus, the resulting delay in adjudicating the applications is unreasonable.

13. There exists an actual and justiciable controversy between Plaintiffs and Defendant requiring resolution by this Court. Plaintiffs have no other adequate remedy at law.

14. The Court has further remedial authority under the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the Administrative Procedure Act, 5 U.S.C. § 500 et seq.

VENUE

15. Pursuant to 28 U.S.C. § 1391(e), venue is proper in this district on the following grounds: (1) this is a civil action in which Defendant are officers of the United States or agencies thereof acting in their official capacities; (2) Defendant Joseph B. Edlow ("Defendant Edlow"), is director of USCIS, which is located in Camp Springs, Maryland, within Prince George's County; Plaintiffs Mohammadreza Saghafi, Saba Tabatabaee, and Farid Alinejad Almachovan reside in [REDACTED] Maryland, within Prince George's County; and Plaintiff Sarina Faizy resides in [REDACTED] Maryland, within Montgomery County, and no real property is involved; and (3) a substantial part of the events or omissions giving rise to the claim occurred in this district (at USCIS Headquarters in Camp Springs, MD, within Prince George's County).

PARTIES

Plaintiffs

Mehrdad Shamskilani, Boshra Rezvanian, and A.S.

16. Plaintiff Mehrdad Shamskilani is a citizen of Iran and an applicant for a Form I-485, filed on June 6, 2025 based on an approved I-140. USCIS assigned Plaintiff Mehrdad Shamskilani's application the case number: [REDACTED].

17. Plaintiff Boshra Rezvanian is a citizen of Iran, the spouse of Plaintiff Mehrdad Shamskilani, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Boshra Rezvanian's application the case number: [REDACTED].

18. Plaintiff A.S. is the child of Plaintiff Mehrdad Shamskilani and Boshra Rezvanian and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff A.S.'s application the case number: [REDACTED].

Farid Alinejad Almachovan

19. Plaintiff Farid Alinejad Almachovan is a citizen of Iran and an applicant for a Form I-485, filed on October 2, 2025 based on an approved I-140. USCIS assigned Plaintiff Farid Alinejad Almachovan's application the case number: [REDACTED].

Sarina Faizy

20. Plaintiff Sarina Faizy is a citizen of Afghanistan and an applicant for a Form I-485, filed on October 17, 2024 based on an approved Form I-589, Application for Asylum or Withholding from Removal ("Form I-589"). USCIS assigned Plaintiff Sarina Faizy's application the case number: [REDACTED].

Shaheen Pouya and Sadaf Jamalzadeh

21. Plaintiff Shaheen Pouya is a citizen of Iran and an applicant for a Form I-485, filed on

October 1, 2025 based on an approved I-140. USCIS assigned Plaintiff Shaheen Pouya's application the case number: [REDACTED]

22. Plaintiff Sadaf Jamalzadeh is a citizen of Iran, the spouse of Plaintiff Shaheen Pouya, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Sadaf Jamalzadeh's application the case number: [REDACTED]

Alozai Javed

23. Plaintiff Alozai Javed is a citizen of Afghanistan and an applicant for a Form I-485, filed on November 04, 2024, based on an approved I-589, Application for Asylum. Furthermore, Alozai Javed is also an applicant for a Form I-485, filed on April 07, 2025, based on an approved Chief of Mission petition under the Afghan Special Immigrant Visa program due to his loyal and faithful Service to the United States during the 20-year war in Afghanistan. USCIS assigned Plaintiff Alozai Javed's applications the case numbers: [REDACTED] and [REDACTED]

Mohammadreza Saghafi and Saba Tabatabaee

24. Plaintiff Mohammadreza Saghafi is a citizen of Iran and an applicant for a Form I-485, filed on June 30, 2025 based on an approved I-140. USCIS assigned Plaintiff Mohammadreza Saghafi's application the case number: [REDACTED].

25. Plaintiff Saba Tabatabaee is a citizen of Iran, the spouse of Plaintiff Mohammadreza Saghafi, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Saba Tabatabaee's application the case number: [REDACTED].

Reza Alimohammadi and Arezou Rahimi

26. Plaintiff Reza Alimohammadi is a citizen of Iran and an applicant for a Form I-485, filed on June 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Reza Alimohammadi's application the case number: [REDACTED]

27. Plaintiff Arezou Rahimi is a citizen of Iran, the spouse of Plaintiff Reza Alimohammadi, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Arezou Rahimi's application the case number: [REDACTED]

Amir Ahmadi Zahrani and Sarah Binas

28. Plaintiff Amir Ahmadi Zahrani is a citizen of Iran and an applicant for a Form I-485, filed on November 4, 2024 based on an approved I-140. USCIS assigned Plaintiff Amir Ahmadi Zahrani's application the case number: [REDACTED]

29. Plaintiff Sarah Binas is a citizen of Iran, the spouse of Plaintiff Amir Ahmadi Zahrani, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Sarah Binas's application the case number: [REDACTED]

Maysam Qadimi Rabbani and Raha Rahmani

30. Plaintiff Maysam Qadimi Rabbani is a citizen of Iran and an applicant for a Form I-485, filed on July 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Maysam Qadimi Rabbani's application the case number: [REDACTED]

31. Plaintiff Raha Rahmani is a citizen of Iran, the spouse of Plaintiff Maysam Qadimi Rabbani, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Raha Rahmani's application the case number: [REDACTED]

Mehrdad Zandigohar

32. Plaintiff Mehrdad Zandigohar is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Mehrdad Zandigohar's application the case number: [REDACTED]

Shahrokh Paktinat and Tarkan Ghaseminejad Dehkordi

33. Plaintiff Shahrokh Paktinat is a citizen of Iran and an applicant for a Form I-485, filed

on October 21, 2024 based on an approved I-140. USCIS assigned Plaintiff Shahrokh Paktinat's application the case number: [REDACTED].

34. Plaintiff Tarkan Ghaseminejad Dehkordi is a citizen of Iran, the spouse of Plaintiff Shahrokh Paktinat, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Tarkan Ghaseminejad Dehkordi's application the case number:

[REDACTED]

Kayhan Behdin

35. Plaintiff Kayhan Behdin is a citizen of Iran and an applicant for a Form I-485, filed on November 10, 2025 based on an approved I-140. USCIS assigned Plaintiff Kayhan Behdin's application the case number: [REDACTED].

Efrem Brhane

36. Plaintiff Efrem Brhane is a citizen of Eritrea and an applicant for a Form I-485, filed on September 27, 2024 based on an approved Form I-589. USCIS assigned Plaintiff Efrem Brhane's application the case number: [REDACTED].

Pegah Jandaghimeibodi

37. Plaintiff Pegah Jandaghimeibodi is a citizen of Iran and an applicant for a Form I-485, filed on November 17, 2025 based on an approved I-140. USCIS assigned Plaintiff Pegah Jandaghimeibodi's application the case number: [REDACTED].

Mehrdad Khezri Pour and Mina Mahmoodabadi

38. Plaintiff Mehrdad Khezri Pour is a citizen of Iran and an applicant for a Form I-485, filed on October 11, 2024 based on an approved I-140. USCIS assigned Plaintiff Mehrdad Khezri Pour's application the case number: [REDACTED].

39. Plaintiff Mina Mahmoodabadi is a citizen of Iran, the spouse of Plaintiff Mehrdad

Khezri Pour, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mina Mahmoodabadi's application the case number: [REDACTED]

Milad Pooladsanj and Mehrnaz Motamed

40. Plaintiff Milad Pooladsanj is a citizen of Iran and an applicant for a Form I-485, filed on October 2, 2025 based on an approved I-140. USCIS assigned Plaintiff Milad Pooladsanj's application the case number: [REDACTED].

41. Plaintiff Mehrnaz Motamed is a citizen of Iran, the spouse of Plaintiff Milad Pooladsanj, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mehrnaz Motamed's application the case number: [REDACTED].

Reynaldo Aaron Marvez Blanco and Augustina Rovira

42. Plaintiff Reynaldo Aaron Marvez Blanco is a citizen of Venezuela and an applicant for a Form I-485, filed on September 16, 2024 based on an approved Form I-589. USCIS assigned Plaintiff Reynaldo Aaron Marvez Blanco's application the case number: [REDACTED].

43. Plaintiff Augustina Rovira is a citizen of Argentina, the spouse of Plaintiff Reynaldo Aaron Marvez Blanco, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Augustina Rovira's application the case number: [REDACTED].

Shahram ArsangJang, Asiyeh Bakhtiyarkahriz, O.A. and D.A.

44. Plaintiff Shahram ArsangJang is a citizen of Iran and an applicant for a Form I-485, filed on June 4, 2025 based on an approved I-140. USCIS assigned Plaintiff Shahram ArsangJang's application the case number: [REDACTED].

45. Plaintiff Asiyeh Bakhtiyarkahriz is a citizen of Iran, the spouse of Plaintiff Shahram ArsangJang, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Asiyeh Bakhtiyarkahriz's application the case number: [REDACTED].

46. Plaintiff O.A. is the child of Plaintiff Shahram ArsangJang and Plaintiff Asiyeh Bakhtiyarkahriz, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff O.A.'s application the case number: [REDACTED]

47. Plaintiff D.A. is the child of Plaintiff Shahram ArsangJang and Plaintiff Asiyeh Bakhtiyarkahriz, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff D.A.'s application the case number: [REDACTED].

Mohammadkazem Meidani and Seyedeh Parshin Shojaee

48. Plaintiff Mohammadkazem Meidani is a citizen of Iran and an applicant for a Form I-485, filed on November 29, 2024 based on an approved I-140. USCIS assigned Plaintiff Mohammadkazem Meidani's application the case number: [REDACTED]

49. Plaintiff Seyedeh Parshin Shojaee is a citizen of Iran, the spouse of Plaintiff Mohammadkazem Meidani, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Seyedeh Parshin Shojaee's application the case number:

[REDACTED]

Mohammad Dehghan Rouzi

50. Plaintiff Mohammad Dehghan Rouzi is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Mohammad Dehghan Rouzi's application the case number: [REDACTED].

Sanaz Nazari

51. Plaintiff Sanaz Nazari is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2024 based on an approved I-140. USCIS assigned Plaintiff Sanaz Nazari's application

the case number: [REDACTED]

Negin Alizadehvandchali

52. Plaintiff Negin Alizadehvandchali is a citizen of Iran and an applicant for a Form I-485, filed on October 6, 2025 based on an approved I-140. USCIS assigned Plaintiff Negin Alizadehvandchali's application the case number: [REDACTED].

Faridoon Mohammadi

53. Plaintiff Faridoon Mohammadi is a citizen of Afghanistan and an applicant for a Form I-485, filed on March 20, 2023 based on an approved Form I-589. USCIS assigned Plaintiff Faridoon Mohammadi's application the case number: [REDACTED].

Arman Adibi and Sabiha Tajdari

54. Plaintiff Arman Adibi is a citizen of Iran and an applicant for a Form I-485, filed on November 6, 2025 based on an approved I-140. USCIS assigned Plaintiff Arman Adibi's application the case number: [REDACTED]

55. Plaintiff Sabiha Tajdari is a citizen of Iran, the spouse of Plaintiff Arman Adibi, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Sabiha Tajdari's application the case number: [REDACTED]

Mohsen Sadeghi

56. Plaintiff Mohsen Sadeghi is a citizen of Iran and an applicant for a Form I-485, filed on February 28, 2023 based on an approved I-140. USCIS assigned Plaintiff Mohsen Sadeghi's application the case number: [REDACTED]

Bahareh Rahimi

57. Plaintiff Bahareh Rahimi is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2024 based on a pending I-130. USCIS assigned Plaintiff Bahareh Rahimi's application the case number: [REDACTED].

Mohsen Faghihinezhad and Tahere Shahidipour

58. Plaintiff Mohsen Faghihinezhad is a citizen of Iran and an applicant for a Form I-485, filed on June 5, 2025 based on an approved I-140. USCIS assigned Plaintiff Mohsen Faghihinezhad's application the case number: [REDACTED]

59. Plaintiff Tahere Shahidipour is a citizen of Iran, the spouse of Plaintiff Mohsen Faghihinezhad, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Tahere Shahidipour's application the case number: [REDACTED]

Seydall Naseri

60. Plaintiff Seydall Naseri is a citizen of Afghanistan and an applicant for a Form I-485, filed on September 23, 2024 based on an approved Form I-589. USCIS assigned Plaintiff Seydall Naseri's application the case number: [REDACTED]

Morteza Salimi and Sahar Jomehpour

61. Plaintiff Morteza Salimi is a citizen of Iran and an applicant for a Form I-485, filed on June 13, 2025 based on an approved I-140. USCIS assigned Plaintiff Morteza Salimi's application the case number: [REDACTED].

62. Plaintiff Sahar Jomehpour is a citizen of Iran, the spouse of Plaintiff Morteza Salimi, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Sahar Jomehpour's application the case number: [REDACTED]

Sina Dehestani

63. Plaintiff Sina Dehestani is a dual citizen of Iran and Dominica Commonwealth and an applicant for a Form I-485, filed on October 01, 2025 based on an approved I-140. USCIS assigned Plaintiff Sina Dehestani's application the case number: [REDACTED]

Mostafa Rahgouy and Mehnaz Tabassum

64. Plaintiff Mostafa Rahgouy is a citizen of Iran and an applicant for a Form I-485, filed on December 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Mostafa Rahgouy's application the case number: [REDACTED]

65. Plaintiff Mehnaz Tabassum is a citizen of Bangladesh, the spouse of Plaintiff Mostafa Rahgouy, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mehnaz Tabassum's application the case number: [REDACTED].

Behrad Moniri and Sara Hoseingholizade

66. Plaintiff Behrad Moniri is a citizen of Iran and an applicant for a Form I-485, filed on November 19, 2025 based on an approved I-140. USCIS assigned Plaintiff Behrad Moniri's application the case number: [REDACTED].

67. Plaintiff Sara Hoseingholizade is a citizen of Iran, the spouse of Plaintiff Behrad Moniri, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Sara Hoseingholizade's application the case number: [REDACTED].

Yalda Yazdani

68. Plaintiff Yalda Yazdani is a citizen of Iran and an applicant for a Form I-485, filed on September 29, 2025 based on an approved I-140. USCIS assigned Plaintiff Yalda Yazdani's

application the case number: [REDACTED].

Azin Vakilpour and Eshagh Mohammadyari

69. Plaintiff Azin Vakilpour is a citizen of Iran and an applicant for a Form I-485, filed on October 17, 2025 based on an approved I-140. USCIS assigned Plaintiff Azin Vakilpour's application the case number: [REDACTED].

70. Plaintiff Eshagh Mohammadyari is a citizen of Iran, the spouse of Plaintiff Azin Vakilpour, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Eshagh Mohammadyari's application the case number: [REDACTED].

Maryam Shayan

71. Plaintiff Maryam Shayan is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Maryam Shayan's application the case number: [REDACTED].

Bahar Bakhshi

72. Plaintiff Bahar Bakhshi is a citizen of Iran and an applicant for a Form I-485, filed on June 5, 2025 based on an approved I-140. USCIS assigned Plaintiff Bahar Bakhshi's application the case number: [REDACTED].

Arsh Haj Mohamad Ebrahim Ketabforoush

73. Plaintiff Arsh Haj Mohamad Ebrahim Ketabforoush is a citizen of Iran and an applicant for a Form I-485, filed on January 2, 2025 based on an approved I-140. USCIS assigned Plaintiff Arsh Haj Mohamad Ebrahim Ketabforoush's application the case number: [REDACTED].

Rafi Zahedi

74. Plaintiff Rafi Zahedi is a citizen of Iran and an applicant for a Form I-485, filed on February 23, 2023 based on an approved I-140. USCIS assigned Plaintiff Rafi Zahedi's application the case number: [REDACTED]

MohammadReza Alivand and S.A.

75. Plaintiff MohammadReza Alivand is a citizen of Iran and an applicant for a Form I-485, filed on October 29, 2025 based on an approved I-140. USCIS assigned Plaintiff MohammadReza Alivand's application the case number: [REDACTED]

76. Plaintiff S.A. is the child of Plaintiff MohammadReza Alivand, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff S.A.'s application the case number: [REDACTED].

Hosna Rastegarpouyani and Mohammad Rahiminejat

77. Plaintiff Hosna Rastegarpouyani is a citizen of Iran and an applicant for a Form I-485, filed on June 2, 2025 based on an approved I-140. USCIS assigned Plaintiff Hosna Rastegarpouyani's application the case number: [REDACTED].

78. Plaintiff Mohammad Rahiminejat is a citizen of Iran, the spouse of Plaintiff Hosna Rastegarpouyani, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mohammad Rahiminejat's application the case number: [REDACTED]

Fistm Emhaye Teklay

79. Plaintiff Fistm Emhaye Teklay is a citizen of Eritrea and an applicant for a Form I-485, filed on October 17, 2025 based on an approved Form I-589. USCIS assigned Plaintiff Fistm Emhaye Teklay's application the case number: [REDACTED].

Mohamad Zamini

80. Plaintiff Mohamad Zamini is a citizen of Iran and an applicant for a Form I-485, filed on December 16, 2024 based on an approved I-140. USCIS assigned Plaintiff Mohamad Zamini's application the case number: [REDACTED]

Saba Aslani

81. Plaintiff Saba Aslani is a citizen of Iran and an applicant for a Form I-485, filed on July 2, 2025 based on an approved I-140. USCIS assigned Plaintiff Saba Aslani's application the case number: [REDACTED]

Mohammad Khosravikia

82. Plaintiff Mohammad Khosravikia is a citizen of Iran and an applicant for a Form I-485, filed on October 4, 2024 based on an approved I-140. USCIS assigned Plaintiff Mohammad Khosravikia's application the case number: [REDACTED].

Nima Alamatsaz

83. Plaintiff Nima Alamatsaz is a citizen of Iran and an applicant for a Form I-485, filed on October 27, 2025 based on an approved I-140. USCIS assigned Plaintiff Nima Alamatsaz's application the case number: [REDACTED]

Alexander Saavedra Melo

84. Plaintiff Alexander Saavedra Melo is a citizen of Venezuela and an applicant for a Form I-485, filed on December 14, 2022 based on a Pending I-130. USCIS assigned Plaintiff Alexander Saavedra Melo's application the case number: [REDACTED]

Marjan Azin

85. Plaintiff Marjan Azin is a citizen of Iran and an applicant for a Form I-485, filed on June 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Marjan Azin's application the case number: [REDACTED]

Nasrin Haghighinajafabadi and Mohammad Eskandari

86. Plaintiff Nasrin Haghighinajafabadi is a citizen of Iran and an applicant for a Form I-485, filed on June 20, 2025 based on an approved I-140. USCIS assigned Plaintiff Nasrin Haghighinajafabadi's application the case number: [REDACTED].

87. Plaintiff Mohammad Eskandari is a citizen of Iran, the spouse of Plaintiff Nasrin Haghighinajafabadi, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mohammad Eskandari's application the case number: [REDACTED].

Sahar Rostami

88. Plaintiff Sahar Rostami is a citizen of Iran and an applicant for a Form I-485, filed on October 10, 2025 based on an approved I-140. USCIS assigned Plaintiff Sahar Rostami's application the case number: [REDACTED].

Saman Rahmati

89. Plaintiff Saman Rahmati is a citizen of Iran and an applicant for a Form I-485, filed on October 3, 2025 based on an approved I-140. USCIS assigned Plaintiff Saman Rahmati's application the case number: [REDACTED]

Sina Shariati Samani

90. Plaintiff Sina Shariati Samani is a citizen of Iran and an applicant for a Form I-485, filed on October 18, 2023 based on an approved I-140. USCIS assigned Plaintiff Sina Shariati Samani's

application the case number: [REDACTED].

Hasan Hadid and Fatima Abdou

91. Plaintiff Hasan Hadid is a citizen of Syria and an applicant for a Form I-485, filed on October 11, 2022 based on a pending I-130. USCIS assigned Plaintiff Hasan Hadid's application the case number: [REDACTED].

92. Plaintiff Fatima Abdou is a citizen of Syria and an applicant for a Form I-485, filed on October 11, 2022 based on a pending I-130. USCIS assigned Plaintiff Fatima Abdou's application the case number: [REDACTED].

Fatemeh Mottaghian and Mladen Djekic

93. Plaintiff Fatemeh Mottaghian is a citizen of Iran and an applicant for a Form I-485, filed on May 30, 2025 based on an approved I-140. USCIS assigned Plaintiff Fatemeh Mottaghian's application the case number: [REDACTED].

94. Plaintiff Mladen Djekic is a citizen of Canada, the spouse of Plaintiff Fatemeh Mottaghian, and an applicant for a Form I-485 based upon their derivative status. USCIS assigned Plaintiff Mladen Djekic's application the case number: [REDACTED].

Alireza Salemi

95. Plaintiff Alireza Salemi is a citizen of Iran and an applicant for a Form I-485, filed on December 31, 2025 based on an approved I-140. USCIS assigned Plaintiff Alireza Salemi's application the case number: [REDACTED].

Vahid Barzegar

96. Plaintiff Vahid Barzegar is a citizen of Iran and an applicant for a Form I-485, filed on

July 16, 2025 based on an approved I-140. USCIS assigned Plaintiff Vahid Barzegar's application the case number: [REDACTED]

Poorya Mirkhosravi

97. Plaintiff Poorya Mirkhosravi is a citizen of Iran and an applicant for a Form I-485, filed on November 14, 2025 based on an approved I-140. USCIS assigned Plaintiff Poorya Mirkhosravi's application the case number: [REDACTED].

Nazila Rahimi

98. Plaintiff Nazila Rahimi is a citizen of Afghanistan and an applicant for a Form I-485, filed on November 23, 2022 based on a pending Form I-360, Petition for Amerasian, Widow(er), or Special Immigrant. USCIS assigned Plaintiff Nazila Rahimi's application the case number:

[REDACTED].

Defendant

Defendant Edlow

99. Defendant Edlow is the Director of the U.S. Citizenship and Immigration Services, an agency of the federal government within the Department of Homeland Security ("DHS") that is responsible for the administration of laws and statutes governing immigration and naturalization and the adjudication of petitions for immigration benefits, including petitions for noncitizens. 6 U.S.C. § 271. As such, he is charged with the duty of administration and enforcement of all the functions, powers, and duties of USCIS nationally.

100. On December 5, 2025, a few days after the Policy Memorandum I was issued, USCIS posted a video of Defendant Edlow on Instagram where he said, "we took decisive action...we

also have announced that we are pausing any adjudications of immigrant benefits and nonimmigrant benefits for any individual from the 19 countries of concern that the president listed in his proclamation, his 212(f) proclamation banning entry back in June. So we are taking decisive action...” See: <https://www.instagram.com/p/DR4n7jVDIaS/>.



101. Defendant Edlow is sued in his official capacity.

LEGAL FRAMEWORK

102. Federal immigration laws allow certain foreign nationals to obtain lawful permanent residency in the U.S. through a family-based petition, on the basis of employment, selection as a Diversity Visa program, or following a grant of asylum. After family-based immigration, employment is the next most common route by which a foreign national may obtain a green card. See 8 USC 1255; INA § 203(b)(2); 8 U.S.C. § 1153(b)(2).

103. After completing the I-485, filing supporting documents and paying the applicable fees, the applicant will receive a biometrics appointment date. USCIS requires all applicants and their derivative beneficiaries to be fingerprinted for the purpose of conducting a security clearance and a criminal background check.

104. Once an applicant has been fingerprinted, USCIS may schedule an interview to further evaluate the applicant's eligibility for adjustment of status. USCIS may also decide to waive the interview.

105. Following the interview, USCIS will then make a decision on the I-485 application in the form of approval, issue a Request for Evidence ("RFE"), or a denial.

106. If USCIS requires additional information or documentation to support the I-485 application, they will request it in the form of an RFE.

107. In some cases, USCIS may issue a Notice of Intent to Deny ("NOID") if the adjudicator believes the application likely does not warrant approval even with additional evidence.

108. If the I-485 application is approved, the applicant will receive a Notice of Approval informing them that the adjustment of status is approved.

109. If the application is denied, the applicant must be notified of the reasons for the denial and of the right to appeal.

110. USCIS requires a definitive Interagency Border Inspection System (IBIS) Name Check, FBI Fingerprint check, and FBI Name Check to be obtained and resolved before an application for Adjustment of Status Application can be approved.

STATEMENT OF FACTS

111. All Plaintiffs, including 57 primary applicant Plaintiffs and their derivative spouses and children (where applicable), have submitted a Form I-485. Exhibit D, USCIS Online Case Statuses.

112. On December 2, 2025, USCIS published Policy Memorandum I on its website. Exhibit A, December 2, 2025 USCIS Policy Memorandum. Policy Memorandum I explicitly withholds

USCIS adjudications for citizens from 19 countries identified in PP 10949.

113. On January 1, 2026, USCIS published Policy Memorandum II on its website, which notes “[t]his memorandum does not supersede the guidance in Policy Memorandum, Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High Risk Countries on December 1, 2025 except as specified under the ‘Exceptions to the Adjudication Hold’ outlined in this memorandum,” noting that the public-facing version of the Policy Memorandum was published December 2, 2025. Exhibit B, January 1, 2026 USCIS Policy Memorandum, at 1,¶1. None of the exceptions listed appear to apply to any Plaintiffs. Policy Memorandum II expanded the number of travel ban countries to include the following 39 countries, plus the Palestinian Authority: Afghanistan, Angola, Antigua and Barbuda, Benin, Burkina Faso, Burma, Burundi, Chad, Republic of the Congo, Cote d’Ivoire, Cuba, Dominica, Equatorial Guinea, Eritrea, Haiti, Gabon, The Gambia, Iran, Laos, Libya, Malawi, Mali, Mauritania, Niger, Nigeria, Palestinian Authority, Sierra Leone, Senegal, Somalia, South Sudan, Sudan, Syria, Tanzania, Togo, Tonga, Turkmenistan, Venezuela, Yemen, Zambia, and Zimbabwe.

114. According to an email from USCIS to the Office of Senator Schiff, USCIS believes the hold is an “exercise of its authority to investigate immigration benefit requests filed by aliens who may pose risks to the national security and public safety of the United States, as outlined in DHS Delegation of Authority 0150.1, issued June 5, 2003.” Exhibit C, USCIS Email to Senator Schiff’s Office. While that delegation gives the authority to investigate, and the authority to interrogate, it extends no authority to implement a hold on I-485 applications.

115. Plaintiffs and their family have been significantly harmed by the hold of adjudications of their Forms I-485. This indefinite hold has left their lives and future in the U.S. suspended in a

state of prolonged uncertainty. Without their green cards and permanent residence status, Plaintiffs face significant obstacles in planning for their future, including in many cases, seeking and securing gainful employment.

116. Many Plaintiffs are researchers, physicians, and scientists whose work the United States has already deemed vital to the national interest. For example, Plaintiff [REDACTED] is a postdoctoral researcher whose work focuses on cancer research. USCIS approved her Form I-140 (National Interest Waiver / Alien of Extraordinary Ability) petition, formally recognizing that her work is of 'national importance' to the United States. Despite this finding by the agency itself, the same agency is now threatening her ability to permanently reside and work in the U.S., directly contradicting its own determination that her presence benefits the US. In fact, her H-1B status expires on May 31, 2026. Similarly, Plaintiff [REDACTED] has signed an employment contract with Microsoft for a Data Scientist position scheduled to begin on May 16, 2026, but since the role requires permanent work authorization, he will not be able to start work without adjustment of status.

117. Defendant's delay has also affected Plaintiffs ability to become eligible for U.S. citizenship, and the extensive rights and benefits that accompany it, including the right to vote and fully participate in the democratic process, the ability to obtain a U.S. passport for unrestricted travel, eligibility for jobs restricted to U.S. citizens, the opportunity to run for public office, and the ability to sponsor immediate family members for immigration to the United States.

118. Plaintiffs remain constrained by the limitations in their ability to travel, including the risk of logistical challenges, such as airlines refusing to recognize their status and additional checks when entering the country. As a result, they have been sacrificing opportunities to visit and maintain ties with some of their loved ones abroad.

119. These ongoing harms underscore the tangible and far-reaching consequences of Defendant's hold on their Form I-485 adjudications.

120. Finally, as Defendant's withholding of the Plaintiffs' Form I-485 adjudications is unlawful, the subsequent delays caused by the withholding are unreasonable.

121. Unless and until Plaintiffs Form I-485 applications are adjudicated, they will continue to suffer severe, concrete and particularized injuries.

LAW AND ARGUMENT

A. Defendant's Mandatory Duty to Adjudicate Plaintiffs' Form I-485 Applications.

122. The INA and the regulations pursuant to the INA impose on the Defendant a mandatory, affirmative, and non-discretionary duty to adjudicate properly filed Form I-485 applications.

123. Courts have found that immigration authorities have a mandatory duty to adjudicate an application. See, e.g., *Iddir*, 301 F.3d at 500 (duty to adjudicate applications under the diversity lottery program); *Patel*, 134 F.3d at 933 (duty to adjudicate visa application); *Yu*, 36 F. Supp. 2d at 932 (duty to process SIJ application in a reasonable amount of time); *Kai Hoo Loo*, 2007 U.S. Dist. LEXIS 17822, at *13 (“Indeed, numerous courts have found that immigration authorities have a non-discretionary duty to adjudicate applications.”); *Am. Acad. of Religion v. Chertoff*, 463 F. Supp. 2d 400, 421 (S.D.N.Y. 2006) (holding that the regulation stating that consular officials either “issue or refuse” a completed visa creates a duty to adjudicate).

124. Moreover, courts have determined that the duty to render a decision on an application is mandatory even where the underlying decision to be made by the agency is a discretionary one; thus, mandamus actions are appropriate to compel the government to exercise its discretion in a case where the government has failed to take any action. See, e.g., *Villa*, 607 F. Supp. 2d at 363

(duty to adjudicate adjustment application in a reasonable amount of time); *Dabone v. Thornburgh*, 734 F. Supp. 195, 200 (E.D. PA. 1990) (holding the Board of Immigration Appeals owed the plaintiff a duty to adjudicate his motion to reopen an exclusion proceeding).

125. In the immigration context, an agency has a general duty to take some action, but does not have a duty to exercise its discretion in any certain manner. *Silveyra v. Moschorak*, 989 F.2d 1012, 1015 (9th Cir. 1993) (“[m]andamus may not be used to instruct an official how to exercise discretion unless that official has ignored or violated ‘statutory or regulatory standards delimiting the scope or manner in which such discretion can be exercised.’”); ***Nigmadzhanov v. Mueller*, 550 F. Supp. 2d 540, 546 (S.D.N.Y. 2008) (the Attorney General has discretion to grant or deny an application, but does not have discretion to simply never adjudicate an adjustment application);** *Soneji v. Dep’t of Homeland Sec.*, 525 F. Supp. 2d 1151, 1155 (N.D. Cal. 2007) (with respect to an APA claim, finding USCIS’ argument that it does not have to adjudicate an adjustment application “not only pushes the bounds of common sense but is also contradicted by a wealth of authority from this and other districts.”) (citing cases).

126. The INA, the Code of Federal Regulations, and longstanding USCIS policy unequivocally impose the duty to adjudicate applications and make clear that it is a mandatory duty on the Defendant.

B. Defendant’s Withholding of Adjudications is Unlawful and Unreasonable.

127. Under the APA, a reviewing court may order action unlawfully withheld or unreasonably delayed. “To the extent necessary to decision and when presented, the reviewing court shall decide all relevant questions of law, interpret constitutional and statutory provisions, and determine the meaning or applicability of the terms of an agency action. The reviewing court

shall compel agency action unlawfully withheld or unreasonably delayed;” and may also “hold unlawful and set aside agency action, findings, and conclusions found to be arbitrary, capricious, and abuse of discretion, or otherwise not in accordance with law” and agency action taken “without observance of procedure required by law” See 5 U.S.C. §§706(1), 706(2)(A), 706(2)(D).

128. Congress has never granted the authority to the executive branch to put a hold on Form I-485 adjudications. Rather, Congress has made clear what it considers a reasonable time for adjudicating immigration benefits. “It is the sense of Congress that the processing of an immigration benefit application should be completed not later than 180 days after the initial filing of the application, except that a petition for a nonimmigrant visa under section 1184(c) of this title should be processed not later than 30 days after the filing of the petition.” See 8 U.S.C. § 1571 and (Pub. L. 106–313, title II, §202, Oct. 17, 2000, 114 Stat. 1262.)

129. Defendant owes Plaintiffs a duty to properly, and in good faith, complete processing of Plaintiffs’ applications and render facially legitimate and bona fide decisions, and Defendant is wholly disregarding that duty.

C. Defendant’s Withholding of Adjudications, and Unreasonable Delay have Harmed Plaintiffs.

130. As a result of Defendant’s abrogation to perform their mandatory duty to adjudicate Plaintiffs I-485 applications within a reasonable amount of time, Plaintiffs have suffered and will continue to suffer substantial, concrete, and particularized injury.

131. Defendant’s hold will cause Plaintiffs’ imminent loss of employment, loss of lawful work authorization, inability to pay rent or relocate for work, and risk of losing job offers due to the uncertainty. Some Plaintiffs, lacking the protection of Lawful Permanent Status, are afraid to leave their homes during heightened ICE activity in their communities.

132. Some hardship is uniquely compelling. For example, Plaintiff ██████████

(“████████”) and her husband ██████████ attended an interview for their Form I-485 applications on September 22, 2025, and at interview, the USCIS officer orally informed them that their cases were approved. However, since USCIS had exhausted visa numbers in her category, EB-2 NIW, for the fiscal year, the USCIS told them it was necessary to wait until October 1, 2025 before the green cards could be produced. (Other Plaintiffs, including Plaintiffs ██████████ and ██████████, whose adjustment is also based upon EB-2 NIW, had the same experience). After the USCIS officer verbally approved ██████████’s application, she applied for and received a formal employment offer from GE Aerospace for the position of Mechanical Analysis Lead Engineer. The project involves the GE9X, the largest turbofan jet engine ever to be built. This engine will be used on Boeing commercial aircraft. The GE9X program directly aligns with the national interests of the United States, as it strengthens U.S. leadership in advanced aerospace propulsion technology and global aviation competitiveness. GE Aerospace requires lawful permanent resident status to commence employment. Without adjudication of the adjustment of status application, ██████████ will lose the opportunity to work at GE Aerospace and contribute to the development and advancement of the world’s largest turbofan engine and the national interest of the United States, causing immediate and irreparable professional and financial harm. In reliance on USCIS’s approval, ██████████ transitioned to employment under her I-485 employment authorization and lost her underlying nonimmigrant status, reasonably believing that lawful permanent residence would be issued within weeks. Instead, she now remains indefinitely without underlying status through no fault of her own. ██████████ is currently authorized to work only under her I-485 employment authorization and faces ongoing legal uncertainty, including documented risks of enforcement actions against individuals in similar circumstances, despite full compliance with immigration law.

133. In another example, Plaintiff [REDACTED], whose research focused on pancreatic cancer, has a minor daughter, Plaintiff [REDACTED] whose life is fully integrated into the US education system. She has built her academic, social, and extracurricular life entirely here in the US, but Defendant's hold threatens her educational future at a critical stage of her development.

134. In another example, Plaintiff [REDACTED] had a daughter born in 2021 while he was absent in faithful service to the United States as an interpreter, and even supporting the US Mission to relocate aircraft from Afghanistan to Tajikistan during the evacuation from Afghanistan. [REDACTED] has yet to meet that daughter, or seen his spouse and other four children since 2021 because they are in Afghanistan. [REDACTED] yearns for the Lawful Permanent Resident status that would allow him to visit his family, in a third country for safety, after years of separation caused by his service to this country.

135. In another example, Plaintiff [REDACTED] had two cancelled interviews, and now no longer has work authorization.

136. Further, many Plaintiffs currently have F nonimmigrant student status, and DHS has proposed a rule to cap F1 status to 4 years, which is expected to be announced within a month. 8 CFR Parts 214, 248, and 274a, available at: <https://www.federalregister.gov/documents/2025/08/28/2025-16554/establishing-a-fixed-time-period-of-admission-and-an-extension-of-stay-procedure-for-nonimmigrant>. Since Plaintiffs' adjustment of status is on "hold" indefinitely and leaving the US while adjustment of status is pending means cancelling the adjustment of status application, putting them in the situation where they cannot study or work in the interim puts them in an impossible situation.

137. Defendant's inaction has also effectively impeded and delayed Plaintiffs ability to eventually apply for naturalization. Thus, Defendant's withholding, and unreasonable delay in

adjudications has further deprived Plaintiffs of future citizenship benefits like the right to vote and fully participate in our democracy; receive a U.S passport; travel freely into and out of the United States; hold a job that is restricted to United States citizens; to run for public office, and the ability to petition for any family members to immigrate to the U.S. as immediate relatives.

138. The physical, financial, and emotional stresses that Plaintiffs have suffered because of Defendant's failure to act on their Form I-485 applications have exacted a significant toll on Plaintiffs that will not be relieved until their Form I-485 applications are adjudicated.

139. Further, Defendant's Policy Memorandums are harming the national interest of the US, as many Plaintiffs, like ██████ above, have approved Form I-140, Immigrant Petition for Alien Workers in the EB1 and EB-2-NIW categories where USCIS has already recognized they are in the national interest.

D. Plaintiffs are Entitled to Relief.

140. District courts have mandamus jurisdiction to "compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff." 28 U.S.C. § 1361. Moreover, a district court reviewing agency action under the APA may "compel agency action unlawfully withheld or unreasonably delayed." 5 U.S.C. § 706(1). "Agency action" includes, in relevant part, "an agency rule, order, license, sanction, relief, or the equivalent or denial thereof, or failure to act." 5 U.S.C. § 551(13).

141. Pursuant to the APA, 5 U.S.C. §§706(1), 706(2)(A), 706(2)(D), a reviewing court may also "hold unlawful and set aside agency action, findings, and conclusions found to be arbitrary, capricious, and abuse of discretion, or otherwise not in accordance with law" and agency action taken "without observance of procedure required by law."

142. The APA requires administrative agencies to conclude matters presented to them

“within a reasonable time.” 5 U.S.C. § 555. The INA’s implementing regulations provide that when a Form I-485 application has been properly completed and executed it must be either approved or denied. 8 C.F.R. § 245.2(a)(5). USCIS does not have the right to interminably suspend action on a Form I-485 application; it must decide and act consistent with that decision by either issuing or formally refusing the Form I-485 application.

143. Defendant’s failure to act violates the APA, 5 U.S.C. § 706(1), the INA and its implementing regulations, and agency policy. Because Defendant has failed to carry out his duties and obligations under the law and governing regulations, depriving Plaintiffs of their clearly established rights, Plaintiffs are entitled to a writ of mandamus and/or relief under the APA directing Defendant to adjudicate their Form I-485 applications forthwith.

CAUSES OF ACTION

COUNT ONE: 28 U.S.C. § 1361- Writ of Mandamus

144. Plaintiffs repeat and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

145. Under 28 U.S.C. § 1361, “[t]he district courts shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff.”

146. A mandamus plaintiff must demonstrate that: (i) he or she has a clear right to the relief requested; (ii) the defendant has a clear duty to perform the act in question; and (iii) no other adequate remedy is available. *Liberty Fund, Inc. v. Chao*, 394 F. Supp. 2d 105, 113 (D.D.C. 2005); see also *Patel*, 134 F. 3d at 933 (duty to adjudicate an immigrant visa application).

147. The Plaintiffs clearly meet all three of these criteria. See, e.g., *Raduga USA*, 440 F.

Supp. 2d at 1146 (“Plaintiffs’ claim here is clear and certain, and the consul’s nondiscretionary, ministerial duty is plainly prescribed. Furthermore, Plaintiffs have no other means to compel the United States consul to make a decision.”) *United States v. Kerry*, 168 F.Supp.3d 268, 291-92 (D.D.C. 2016)(holding the doctrine of consular non-reviewability did not apply where plaintiffs’ visa applications were not formally refused, but were held in “administrative processing”); see also *Patel v. Reno*, 134 F.3d 929, 932-33 (9th Cir. 1997)(affirming the granting of mandamus relief where plaintiff’s application had only been “provisionally refused”); *Maramjaya v. U.S. Citizenship & Immigration Servs.*, 2008 WL 9398947, at 4 (D.D.C. Mar. 26, 2008)(holding that the doctrine of consular non-reviewability did not apply when the case had not procedurally progressed to the point where consular immunity would bar judicial review”).

148. Defendant has a clear non-discretionary duty to adjudicate Plaintiffs’ Form I-485 applications.

149. Defendant owes a duty to act upon Plaintiffs’ Form I-485 applications.

150. The INA, and the regulations pursuant to it, impose on Defendant a nondiscretionary duty to timely adjudicate Plaintiffs’ Form I-485 applications and to complete any background checks, interviews, or other investigations required by USCIS in order to do so.

151. Plaintiffs assert that Defendant has no legal basis for failing to proceed with the applications, and that they have no adequate remedy at law for Defendant’s failure to timely adjudicate the applications and any background checks or other investigations required.

152. Nonetheless, Defendant has willfully and unreasonably failed to adjudicate Plaintiffs applications, thereby depriving Plaintiffs of their rights to have properly filed applications decided in a timely manner.

153. Defendant has failed in their duty to adjudicate Plaintiffs’ Form I-485 applications by

refusing to make decisions.

154. Adjudication of Plaintiffs' Form I-485 applications is a purely ministerial, non-discretionary act which the Defendant is under obligation to perform in a timely manner; the Plaintiffs have no alternative means to obtain adjudication; and their right to issuance of the writ is "clear and indisputable." *Allied Chemical Corp. v. Daiiflon, Inc.*, 449 U.S. 33, 35 (1980); see also *First Federal Savings and Loan Ass'n of Durham*, 860 F.2d at 138; *Patel*, 134 F.3d at 933 ("[W]e find that the consulate had a duty to act and that to date ... the consulate has failed to act in accordance with that duty and the writ [of mandamus] should issue.").

155. A mandamus action is also appropriate because Defendant failed to act within a reasonable time. See, e.g., *Liu v. Novak*, 509 F. Supp. 2d 1, 9 (D.D.C. 2007) (holding that the APA requires the government to act within a reasonable period of time); see also *Sierra Club v. Thomas*, 828 F.2d 783, 794 (D.C. Cir. 1987) (stating that "regardless of what course it chooses, the agency is under a duty not to delay unreasonably in making that choice").

156. As noted above, it is the sense of Congress that the processing of an immigration benefit application should be completed not later than 180 days after the initial filing of the application. See 8 U.S.C. § 1571 and (Pub. L. 106–313, title II, §202, Oct. 17, 2000, 114 Stat. 1262.)

157. Defendant has a clear, non-discretionary, and mandatory duty to adjudicate Plaintiffs' Form I-485 applications. There is no legal bar to doing so.

158. Accordingly, Plaintiffs have a clear and indisputable right to have their applications adjudicated.

159. No alternative remedy exists to compel action by Defendant.

COUNT TWO: Administrative Procedure Act,
5 U.S.C. § 555(b) § 706(1) et seq.

160. Plaintiffs repeat and incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

161. Pursuant to the APA, 5 U.S.C. § 555(b), Defendant has a nondiscretionary duty to act “within a reasonable time” upon matters presented to them.

162. Pursuant to the APA, 5 U.S.C. § 706(1), a court may compel agency action unlawfully withheld or unreasonably delayed.

163. Pursuant to the APA, 5 U.S.C. §§706(1), 706(2)(A), 706(2)(D), a reviewing court may also “hold unlawful and set aside agency action, findings, and conclusions found to be arbitrary, capricious, and abuse of discretion, or otherwise not in accordance with law” and agency action taken “without observance of procedure required by law”; “in excess of statutory jurisdiction, authority, or limitations, or short of statutory right,” 5 U.S.C. 706(C); or “without observance of procedure required by law,” 5 U.S.C. § 706(D). “Agency action” includes, in relevant part, “an agency rule, order, license, sanction, relief, or the equivalent thereof, or failure to act.” 5 U.S.C. § 551(13).

164. Plaintiffs are eligible for and have fulfilled all statutory requirements for Form I-485 adjudications. Plaintiffs have submitted all necessary information and evidence supporting the applications, and paid all applicable fees.

165. Defendant has failed to carry out the adjudicative and administrative functions delegated to him by law.

166. Further, Defendant’s delay in acting on Plaintiffs’ Form I-485 applications is unreasonable and constitutes agency action wrongfully withheld or unreasonably delayed because the reason for the delay is unlawful withholding. Plaintiffs face irreparable harm if the failure to act persists, a fact which is well known to Defendant.

167. Additionally, the delay is unreasonable in light of USCIS' own statements that FBI Name Checks are resolved within two weeks in 80% of cases, and most of the remaining 20% are resolved in the following two weeks.

168. Further, the failure of Defendant to adjudicate Plaintiffs'I-485 applications within a reasonable time, especially in the context of the reasons for the delays being an unlawful withholding violates the APA, 5 U.S.C. § 555(b); 5 U.S.C. §§ 706(1), 706(2)(A), 706(2)(C), 706(2)(D).

169. Further, Plaintiffs allege impropriety. On the past New Year's Eve, December 31, 2025, when people across the world were making resolutions about their goals and hopes for the new year, the Department of Homeland Security (the department which housing USCIS), made a post on the social media provider X romanticizing the administration's vision of US free from any immigrants at all, which already has over 20 million views. See: <https://x.com/DHSgov/status/2006472108222853298?s=20>. As the entire U.S. foreign-born population is only 47 million people (most of them legal immigrants), when the administration talks about "100 Million Deportations," that implies deporting the entire U.S. foreign-born population in the US, including Plaintiffs here, as well as 53 million native-born US citizens. Defendants' Policy Memorandums are just an early step in satisfying DHS's resolution for 2026. If this behavior does not demonstrate impropriety, it is difficult to imagine a scenario that could.

170. As a result of Defendant's actions and failure to act, Plaintiffs have suffered and will continue to suffer injury. No alternative remedy exists to compel action by Defendant.

COUNT THREE: The Policy Memorandums' "Hold" is Arbitrary, Capricious, an Abuse of Discretion, or Otherwise Not in Accordance with Law, 5 U.S.C. 706(2)(A)

171. Plaintiffs repeat and incorporate by reference each and every allegation contained in the

preceding paragraphs as if fully set forth herein.

172. The APA provides that a reviewing court shall hold unlawful and set aside agency action, findings, and conclusions found to be... “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. 706(2)(A).

173. "Agency action is valid 'if a reasonable basis exists for [the agency's] decision.'" *Pacito v. Trump*, 768 F. Supp. 3d 1199, 1232 (W.D. Wash. 2025) (finding plaintiffs were likely succeed on their claims that Executive Order 14163, *Realigning the United States Refugee Admissions Program* (“EO 14163”) was arbitrary and capricious) (currently subject to an interim stay pending the outcome of appeal). In *Pacito*, the court found that government Defendant “did not, as is required under arbitrary-and-capricious review, acknowledge, let alone meaningfully consider, the reliance interests of refugees, U.S. citizens, and resettlement nonprofits harmed by their actions.” *Id.* at 1233. “Nor did they articulate any consideration of alternative options.” *Id.*

174. Here, like in *Pacito*, Defendant did not acknowledge, let alone meaningfully consider, the reliance interests of Form I-485 applicants harmed by their actions. Thus, Defendant’s decision to withhold adjudications was arbitrary and capricious, and the Court should enjoin.

**COUNT FOUR: Agency Action Without Observance of Procedure
Required by Law In Violation of 5 U.S.C. § 706(2)(D)**

175. Plaintiffs repeat and incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

176. The APA requires administrative agencies to follow notice-and-comment rulemaking procedures to promulgate substantive rules. 5 U.S.C. § 553.

177. The Administrative Procedure Act defines “rule” broadly to include “the whole or part of an agency statement of general or particular applicability and future effect designed to

implement, interpret, or prescribe law or policy or describing the organization, procedure, or practice requirements of an agency and includes the approval or prescription for the future of rates, wages...” 5 U.S.C. § 551(4).

178. Defendant promulgated and relied upon the policies, procedures, and practices placing on hold all pending benefits requests for aliens from countries listed in PP 10949, without authority and without notice-and-comment rulemaking. Defendant’s actions are therefore unlawful.

179. Defendant’s policies, procedures, and practices placing on hold all pending immigration benefits for nationals from 39 countries, and the Palestinian Authority, constitutes a substantive rule subject to the APA’s notice-and-comment requirements.

180. Defendant’s policies, procedures, and practices suspending the adjudication of immigration benefits for citizens from 39 countries plus the Palestinian Authority constitute a substantive rule because it affirmatively circumscribes USCIS’s Congressional mandate and nondiscretionary duty to adjudicate and issue decisions for properly submitted immigration applications.

181. Defendant’s policies, procedures, and practices halting the adjudication of pending immigration benefits constitute a substantive rule because it is a categorical rule which applies to almost all pending benefits, including Form I-485 applications for applicants of 39 countries, plus the Palestinian Authority.

182. In implementing USCIS’s policies, procedures, and practices halting adjudication of immigration benefits for beneficiaries from 39 countries, plus the Palestinian Authority, Defendant impermissibly announced a new rule without undertaking notice-and-comment rulemaking.

183. Plaintiffs were harmed, and continue to be harmed, by these unlawful acts.

COUNT FIVE: Immigration and Nationality Act, 8 U.S.C. § 1152(a)(1)(A)

184. Plaintiffs repeat and incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

185. Under the INA, Plaintiffs have a right to be free from discrimination based on their ethnicity and national origin. See 8 U.S.C. § 1152(a)(1)(A) (“[N]o person shall receive any preference or priority or be discriminated against in the issuance of an immigrant visa because of the person’s race, sex, nationality, place of birth, or place of residence.”).

186. Here, Defendant promulgated the Policy Memorandums that withhold USCIS benefits based upon an applicant’s national origin in direct violation of the Nondiscrimination Clause of the INA. Thus, Defendant’s Policy Memorandums violate the INA, and should be enjoined by the Court.

COUNT SIX: Equal Protection, Fifth Amendment of the U.S. Constitution

187. Plaintiffs repeat and incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

188. The Due Process Clause of the Fifth Amendment to the U.S. Constitution provides that “No person shall . . . be deprived of life, liberty, or property, without due process of law.” The Clause contains an equal protection component.

189. The Policy Memorandums cause discrimination to Plaintiffs, who are physically present in the United States, on the basis of national origin, a suspect classification, and is not narrowly tailored to serve a compelling governmental interest, and thereby violates the equal protection

component of the Due Process Clause.

190. Further, Defendant lacks any true rational basis for the national origin discrimination.

191. Nationality is not a permissible criterion for domestic adjudication of adjustment of status.

192. Additionally, the Policy Memorandums were substantially motivated by an intent to discriminate against citizens from travel ban countries, on whom it has a disparate effect, in further violation of the equal protection component of the Due Process Clause.

193. Thus, the Policy Memorandums' hold on adjudications of Plaintiffs' applications should be enjoined.

COUNT SEVEN: *Ultra Vires*

194. Plaintiffs repeat and incorporate by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

195. The Policy Memorandums rely directly and indirectly upon authority from INA 212(f). Yet, that INA section does not provide Defendant with any authority to do anything and does not allow the president to do anything other than bar entry of a class of aliens. In fact, Defendant has no authority at all to completely withhold USCIS adjudications, including the adjudication of Plaintiffs' Forms I-485.

196. The Court has inherent equitable power to enjoin actions by federal officers in excess of their lawful authority. See, e.g., *Sierra Club v. Trump*, 929 F.3d 670, 694 (9th Cir. 2019) (“The Supreme Court has ‘long held that federal courts may in some circumstances grant injunctive relief against’ federal officials violating federal law.”) (quoting *Armstrong v. Exceptional Child Ctr., Inc.*, 135 S. Ct. 1378, 1384 (2015)); *E.V. v. Robinson*, 906 F.3d 1082, 1090–91 (9th Cir. 2018) (acknowledging freestanding cause of action for “suits alleging that a federal official acted *ultra vires* of statutorily delegated authority” or “violated the Constitution”); *Trudeau v. Fed.*

Trade Comm'n, 456 F.3d 178, 189–190 (D.C. Cir. 2006) (“[J]udicial review is available when an agency acts *ultra vires*, even if a statutory cause of action is lacking.”) (quotation marks omitted).

197. A court in the Ninth circuit recently found that the President cannot use INA § 212(f) to suspend refugee status applications, and that EO 14163 is *ultra vires*. *Pacito v. Trump*, 768 F. Supp. 3d 1199, 1221 (W.D. Wash. 2025). Here, like EO 14163 in *Pacito*, the Policy Memorandums direct the suspension of immigration benefits, such as the adjustment-of-status applications here, contrary to the statutory framework established by Congress for how such benefits may be obtained under INA § 245(a). INA § 245(a) confers discretion on the Secretary of Homeland Security over the grant or denial of individual adjustment applications, not authority to impose a categorical pause on the adjudication of all such applications based on national origin. Also, *Pacito* holds that the President cannot use his authority under INA § 212(f), which governs the entry of aliens, to override statutory schemes, like INA § 245(a), for immigrants already inside the U.S. Finally, unlike *Pacito* plaintiffs’ challenge to EO 14163, here Plaintiffs challenging the Policy Memorandums are inside the US, and INA 212(f) confers no authority to the Executive Branch regarding noncitizens within the US.

198. Thus, the Court should enjoin the Policy Memorandums as applied to Plaintiffs, as it was issued without lawful authority.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court grants the following relief:

- A. Issue a writ of mandamus directing Defendant to complete all steps necessary to adjudicate Plaintiffs' Forms I-485, within thirty (30) days from the date of the order;
- B. Issue an order pursuant to the APA, 5 U.S.C. § 706(1) et seq., directing Defendant to take all steps necessary to adjudicate Plaintiffs' Form I-485 applications, within thirty (30) days from the date of the order;
- C. Enjoin Defendant and those acting under him from any further withholding of, or delay in, the adjudication of Plaintiffs' Form I-485 applications either through Policy Memorandum I or Policy Memorandum II;
- D. Declare that Defendant's continued failure to adjudicate Plaintiffs' Form I-485 applications constitutes agency action unlawfully withheld and thus, unreasonably delayed;
- E. Issue an order pursuant to 8 U.S.C. § 1152(a)(1)(A) and the Due Process Clause of the Fifth Amendment of the U.S. Constitution enjoining Defendant from discriminating against Plaintiffs based upon their nationality;
- F. Enjoin Defendant's Policy Memorandum I and Policy Memorandum II, as they apply to Plaintiffs, for violating the INA, the Constitution, and *Ultra Vires*;
- G. Retain jurisdiction over this action and any attendant proceedings until Defendant has adjudicated Plaintiffs' Form I-485 applications, and communicated that fact to the Court;

- H. Award reasonable costs and attorney fees pursuant to the Equal Access to Justice Act, 42 U.S.C. § 1988, 5 U.S.C. § 504, 28 U.S.C. § 2412 and any other applicable law; and
- I. Grant such further relief as this Court deems just and proper.

Dated: January 11, 2026

Respectfully submitted,

/s/ Curtis Lee Morrison

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EXHIBIT A



U.S. Citizenship
and Immigration
Services

December 2, 2025

PM-602-0192

Policy Memorandum

SUBJECT: Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries¹

Purpose

Effective immediately, this memorandum directs U.S. Citizenship and Immigration Services (USCIS) personnel to:

1. Place a hold on all Forms I-589 (Application for Asylum and for Withholding of Removal), regardless of the alien's country of nationality, pending a comprehensive review;
2. Place a hold on pending benefit requests² for aliens from countries listed in *Presidential Proclamation (PP) 10949, Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats*,³ pending a comprehensive review, regardless of entry date⁴; and
3. Conduct a comprehensive re-review of approved benefit requests for aliens from countries listed in PP 10949 who entered the United States on or after January 20, 2021.⁵

This memorandum mandates that all aliens meeting these criteria undergo a thorough re-review process, including a potential interview⁶ and, if necessary, a re-interview, to fully assess all national security and public safety threats along with any other related grounds of inadmissibility or ineligibility.⁷ An individualized, case-by-case review and assessment will be done of all relevant information and facts. USCIS will also conduct a comprehensive review of all relevant policies,

¹ On June 4, 2025, the President issued Presidential Proclamation 10949, *Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats*. Exercising authority under section 212(f) of the Immigration and Nationality Act (INA), the proclamation imposes restrictions, limitations, and exceptions on the entry of aliens from 19 high-risk countries. Under INA 212(f), the President may suspend or restrict the entry of any aliens deemed detrimental to U.S. interests. See [90 FR 24497 \(PDF\)](#) (June 4, 2025).

² The term "benefit request" in this memorandum does not include USCIS screening activities, including credible fear, reasonable fear, safe third country, third country removal, and threshold screenings under the Asylum Cooperative Agreements.

³ This applies to aliens who list one of the 19 high-risk countries as their Country of Birth or Country of Citizenship.

⁴ Including Form I-485 (Application to Register Permanent Residence or Adjust Status), Form I-90 (Application to Replace Permanent Resident Card (Green Card)), Form N-470 (Application to Preserve Residence for Naturalization Purposes), Form I-751, (Petition to Remove Conditions on Residence), and Form I-131 (Application for Travel Documents, Parole Documents, and Arrival/Departure Records).

⁵ Entered may include admitted, inspected, paroled, or entered without inspection.

⁶ Interviews for this population shall not be waived under any circumstance. For benefit requests where an interview is not required, the case review and evaluation will determine if the alien needs to appear at a USCIS office.

⁷ See INA 212(a)(3)(A), (B), and (F) and 237(a)(4)(A) and (B).

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procedures, and operational guidance for compliance, accuracy, and needed improvements during this time.

This guidance outlines the adjudicative hold, procedural requirements, and processes for the re-review, interview, or re-interview of affected aliens. USCIS personnel are instructed to prioritize national security and public safety concerns and ensure compliance with all applicable laws and regulations during the adjudication process. All findings must be documented in accordance with established protocols to support any subsequent determinations or actions.

Background

On January 20, 2025, the President issued Executive Order (EO) 14161, titled *Protecting the United States from Foreign Terrorist and Other National Security and Public Safety Threats*. This order aims to safeguard U.S. citizens from aliens who may seek to commit terrorist acts, pose threats to national security, promote hateful ideologies, or exploit immigration laws for malicious purposes. EO 14161 underscores the importance of vigilance during the visa issuance process to ensure that individuals approved for admission into the United States do not intend to harm Americans or compromise U.S. national interests.

Recently, the United States has seen what a lack of screening, vetting, and prioritizing expedient adjudications can do to the American people. An Afghan national, Nasir Ahmad Tawhedi, planned a terrorist attack in the United States on Election Day 2024. Tawhedi pled guilty in federal court to conspiring and attempting to provide material support and resources to the Islamic State of Iraq and al-Sham (ISIS).⁸ In another instance, an Afghan national, Rahmanullah Lakanwal, is suspected of planning and executing a terrorist attack in Washington, DC against two National Guard members,⁹ one who was killed and another who remains critically injured. USCIS plays an instrumental role in preventing terrorists from seeking safe haven in the United States and ensuring that USCIS' screening and vetting and adjudications prioritize the safety of the American people and uphold all U.S. laws.

In light of identified concerns and the threat to the American people, USCIS has determined that a comprehensive re-review, potential interview, and re-interview of all aliens from high-risk countries of concern who entered the United States on or after January 20, 2021 is necessary. Lastly, USCIS may, when appropriate, extend this review and re-interview process to aliens who entered the United States outside of this timeframe.

USCIS remains committed to ensuring that all aliens from high-risk countries of concern that entered the United States do not present threats to national security or public safety. To address vulnerabilities during this process, and in order to conduct a comprehensive review of all policies, procedures, and guidance, USCIS has determined that it must implement an adjudicative hold on all pending asylum applications, regardless of the alien's country of nationality, as well as pending benefit requests filed by aliens from high-risk countries outlined in PP 10949. This hold will remain

⁸ See [Afghan National Pleads Guilty to Plotting Election Day Terror Attack in the United States](#), U.S. Department of Justice, June 13, 2025.

⁹ See [Terrorist Who Shot Two National Guard Members in D.C. Was Let into the Country by the Biden Administration's Operation Allies Welcome Program](#), U.S. Department of Homeland Security Press Release, November 26, 2025.

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in effect until lifted by the USCIS Director through a subsequent memorandum. Any requests to lift the hold due to litigation or other extraordinary circumstances must receive approval from the USCIS Director or Deputy Director.¹⁰

Guidance

USCIS has determined the operational necessity to ensure that all asylum applicants and aliens from high-risk countries of concern who entered the United States do not pose a threat to national security or public safety. This effort ensures that USCIS exercises its full authority to investigate immigration benefit requests filed by aliens who may pose risks to the national security and public safety of the United States, as outlined in [DHS Delegation of Authority 0150.1](#), issued June 5, 2003.

USCIS will conduct a thorough review on a case-by-case basis to assess benefit eligibility including whether:

1. The alien is listed in the Terrorist Screening Dataset (TSDS) as a Known or Suspected Terrorist (KST) under Tier 1 or Tier 2 classifications or is included in Tier 3 or Tier 4 of the TSDS with significant derogatory information related to the alien.
2. The alien is connected to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B) of the Immigration and Nationality Act (INA).
3. The alien is linked to prior, current, or planned involvement in, or association with, an activity, individual, or organization that may pose a risk of serious harm or danger to the community, including criminal conduct described in INA 101(a)(43), 212(a)(1)(A)(iii), 212(a)(2), 237(a)(2), or 237(a)(4)(A)(ii).
4. The alien is unable to establish their identity as outlined in PP 10949.¹¹

This process ensures that USCIS exercises its full authority to protect national security and public safety while adhering to the provisions of the INA and applicable laws. USCIS has considered that this direction may result in delay to the adjudication of some pending applications and has weighed that consequence against the urgent need for the agency to ensure that applicants are vetted and screened to the maximum degree possible. Ultimately, USCIS has determined that the burden of processing delays that will fall on some applicants is necessary and appropriate in this instance, when weighed against the agency's obligation to protect and preserve national security.

Within 90 days of issuance of this memorandum, USCIS will prioritize a list for review, interview, re-interview, and referral to ICE and other law enforcement agencies as appropriate, and, in consultation with the Office of Policy and Strategy and the Fraud Detection and National Security Directorate, issue operational guidance.

Use

¹⁰ Any request for an exemption to the adjudicative hold must be coordinated with the Office of Policy and Strategy.

¹¹ See USCIS Policy Manual, Volume 1, General Policies and Procedures, Part E, Adjudications, Chapter 8, Discretionary Analysis [[1 USCIS-PM E.8](#)].

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This policy memorandum is intended solely for the guidance of USCIS personnel in the performance of their official duties, but it does not remove their discretion in making adjudicatory decisions. It may not be relied upon to create any right or benefit, substantive or procedural, enforceable under law or by any individual or other party in removal proceedings, in litigation with the United States, or in any other form or manner.

EXHIBIT B



U.S. Citizenship
and Immigration
Services

January 1, 2026

PM-602-0194

Policy Memorandum

SUBJECT: Hold and Review of USCIS Benefit Applications Filed by Aliens from Additional High-Risk Countries¹

Purpose

Effective immediately, this memorandum directs U.S. Citizenship and Immigration Services (USCIS) personnel to:

1. Place a hold² on all pending benefit applications, for aliens³ listed⁴ in Presidential Proclamation (PP) 10998, *Restricting and Limiting the Entry of Foreign Nationals To Protect the Security of the United States*,⁵ pending a comprehensive review, regardless of entry date;⁶
2. Conduct a comprehensive review of all policies, procedures, and screening and vetting processes for benefit requests for aliens from countries listed in PP 10998; and
3. Conduct a comprehensive re-review of approved benefit requests implicated in PP 10998 that were approved on or after January 20, 2021.

¹ On December 16, 2025, the President issued Presidential Proclamation (PP) 10998, *Restricting and Limiting the Entry of Foreign Nationals To Protect the Security of the United States*. Exercising authority under INA 212(f), the proclamation continues the full restrictions and entry limitations of nationals from the original high-risk countries established under PP 10949, *Restricting the Entry of Foreign Nationals To Protect the United States From Foreign Terrorists and Other National Security and Public Safety Threats* (June 4, 2025), and imposes restrictions, limitations, and exceptions on additional high-risk countries. Under INA 212(f), the President may suspend or restrict the entry of any aliens deemed detrimental to U.S. interests.

² A “hold” allows a case to proceed through processing, up to final adjudication. A “final adjudication” refers to the issuance of a final decision on a case, such as an approval, denial, or dismissal.

³ The term “alien” means any person not a citizen or national of the United States. See INA 101(a)(3) and 8 U.S.C. 1101(a)(3).

⁴ This refers to aliens with a nationality, country of birth, or aliens who have acquired Citizenship by Investment (CBI) listed in PP 10998. “As an example, a foreign national from a country that is subject to travel restrictions could purchase CBI from a second country that is not subject to travel restrictions, obtain a passport in the citizenship of that second country, and subsequently apply for a United States visa for travel to the United States, thus evading the travel restrictions on his or her first country.” Further, this includes aliens with varying nationalities but are traveling on a Palestinian-Authority-issued document.

⁵ This applies to aliens who list one of the high-risk countries as their Country of Birth or Country of Citizenship.

⁶ Immigrant visas for family members of individuals in the United States will no longer be automatically or broadly exempt from PP 10949 and PP 10998 restrictions or requirements. Family-based immigrant visa applications are now subject to the same review, restrictions, or additional scrutiny as other benefit requests.

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This memorandum specifies which cases are subject to the adjudicative hold, identifies exemptions, and outlines the factors to consider when assessing benefit eligibility during the re-review, interview, or re-interview of affected aliens. USCIS personnel are instructed to prioritize national security and public safety concerns and ensure compliance with applicable laws and regulations during the adjudication process. All findings must be documented in accordance with established protocols to support any subsequent determinations or actions.

This memorandum does not supersede the guidance in Policy Memorandum, *Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries* on December 1, 2025⁷ except as specified under the “Exceptions to the Adjudication Hold” outlined in this memorandum.

Background

On January 20, 2025, the President issued Executive Order (EO) 14161, titled *Protecting the United States From Foreign Terrorists and Other National Security and Public Safety Threats*. This order aimed to safeguard U.S. citizens from aliens who may seek to commit terrorist acts, pose threats to national security, promote hateful ideologies, or exploit immigration laws for malicious purposes. EO 14161 underscores the importance of vigilance during the visa issuance process to ensure that individuals approved for admission into the United States do not intend to harm Americans or compromise U.S. national interests.

Accordingly, through PP 10949 and PP 10998, the President restricted the entry of foreign nationals from countries lacking adequate screening and vetting information to safeguard the national security and public safety of the United States and its citizens. The proclamations also instructed the United States Government to promptly engage with the countries identified, outlining the necessary steps to meet U.S. screening, vetting, immigration, and security standards. However, despite those efforts, most of the countries named in PP 10949 and PP 10998 – and others – continue to demonstrate significant deficiencies in screening, vetting, and information sharing. In addition to PP 10949, PP 10998 emphasizes that “it is the policy of the United States to protect its citizens from foreign nationals who intend to commit terrorist attacks, threaten our national security and public safety, incite hate crimes, or otherwise exploit the immigration laws for malevolent purposes.”

Following the continued review since the issuance of PP 10949, as well as the responses of foreign countries to that proclamation, the United States Government has identified additional countries that are unable to meet basic criteria for identifying their nationals and residents who may pose national security and public safety risks, or for sharing necessary information with the United States. It is paramount that the United States Government ensure aliens in the United States do not intend to threaten its citizens or undermine or destabilize its culture, government, institutions, or

⁷ USCIS issued a public-facing version on December 2, 2025. See Policy Memorandum, *Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries*, December 2, 2025 ([PM-602-0192](#)).

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founding principles. Entry will not be granted to aliens who advocate for, aid, or support designated foreign terrorists or other threats to our national security or public safety.

As a result of these reviews and considerations, the President has determined to maintain and adjust the restrictions outlined in sections 2 and 3 of PP 10949 regarding the entry of certain classes of foreign nationals into the United States. Additionally, further limitations have been imposed on the entry of aliens from additional high-risk countries in PP 10998.

Considering identified concerns and the threat to the American people, USCIS has determined a comprehensive re-review, potential interview, and re-interview of all aliens from high-risk countries of concern who entered the United States on or after January 20, 2021, is necessary.⁸

USCIS remains dedicated to ensuring aliens from high-risk countries of concern who have entered the United States do not pose risks to national security or public safety. To faithfully uphold United States immigration law, the flow of aliens from countries with high overstay rates, significant fraud, or both must stop. To address potential vulnerabilities, USCIS will place an adjudicative hold on all pending benefit requests submitted by or for aliens from the high-risk countries identified in PP 10998, allowing for a thorough case-by-case review. This hold will remain in effect until lifted or modified by the USCIS Director through a subsequent memorandum or memorandum attachment. Any requests to lift the hold due to litigation or other extraordinary circumstances must receive approval from the USCIS Director or Deputy Director.

Guidance

USCIS has determined the operational necessity to ensure all aliens from high-risk countries of concern who entered the United States do not pose a threat to national security or public safety. This effort ensures USCIS exercises its full authority to investigate immigration benefit requests filed by or for aliens who may pose risks to the national security and public safety of the United States, as outlined in [DHS Delegation of Authority 0150.1](#), issued June 5, 2003.

USCIS will conduct a thorough review on a case-by-case basis to assess benefit eligibility including whether:

1. The alien is listed in the Terrorist Screening Dataset (TSDS) as a Known or Suspected Terrorist under Tier 1 or Tier 2 classifications or is included in Tier 3 of the TSDS with significant derogatory information related to the alien.
2. The alien is connected to prior, current, or planned involvement in, or association with, an activity, individual, or organization described in sections 212(a)(3)(A), (B), or (F), or 237(a)(4)(A) or (B) of the Immigration and Nationality Act (INA).
3. The alien is linked to prior, current, or planned involvement in, or association with, an activity, individual, or organization that may pose a risk of serious harm or danger to the community, including criminal conduct described in INA 101(a)(43), 212(a)(1)(A)(iii), 212(a)(2), 237(a)(2), or 237(a)(4)(A)(ii).

⁸ Additionally, USCIS may, when appropriate, extend this review and re-interview process to aliens who entered the United States outside of this timeframe.

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4. The alien is unable to establish their identity as outlined in PP 10949 and PP 10998.⁹

Many of these restricted high-risk countries experience widespread corruption, unreliable or fraudulent civil documents and criminal records, and lack effective birth registration systems, which systematically hinder accurate vetting and identity verification. Officers must consider these country-specific factors when conducting security and background checks, and when reviewing civil documents such as passports, marriage and divorce certificates, and birth certificates, as well as criminal history information. Officers must follow established policies to ensure proper screening and vetting procedures are conducted, and that any derogatory information is thoroughly evaluated and appropriately resolved.

This process ensures that USCIS exercises its full authority to protect national security and public safety while adhering to the provisions of the INA and applicable laws. USCIS has considered that this direction may result in delay to the adjudication of some pending applications and has weighed that consequence against the urgent need for the agency to ensure that aliens are vetted and screened to the maximum degree possible. Ultimately, USCIS has determined the burden of processing delays which will fall on some aliens is necessary and appropriate, when weighed against the agency's obligation to protect and preserve our national security.

*Exceptions to the Adjudication Hold*¹⁰

Exceptions to the adjudication hold for cases with identified national security, public safety, or fraud-related derogatory information still require the adjudicative directorate or program office to coordinate with U.S. Immigration and Customs Enforcement (ICE) in accordance with current policies and procedures before final adjudication. The following are exceptions to the adjudication hold:

1. Form I-90, Application to Replace Permanent Resident Card (Green Card);¹¹
2. Form N-565, Application for Replacement Naturalization/Citizenship Document;
3. Form N-600, Application for Certificate of Citizenship;¹²

⁹ See USCIS Policy Manual, Volume 1, General Policies and Procedures, Part E, Adjudications, Chapter 8, Discretionary Analysis [[1 USCIS-PM E.8](#)].

¹⁰ Any request for an exemption to the adjudicative hold must be coordinated with the USCIS Office of Policy and Strategy (OP&S). OP&S will track and record all the hold lifts. OP&S will issue additional guidance within 7 days of issuing this memorandum.

¹¹ Lawful permanent residents are entitled to evidence of status in the United States. Lawful permanent residents are eligible for replacement of their Permanent Resident Card if they meet certain requirements. See USCIS Policy Manual, Volume 11, Travel and Identity Documents, Part B, Permanent Resident Cards, Chapter 2, Replacement of Permanent Resident Card [[11 USCIS-PM B.2](#)].

¹² Except Yemen and Somalia. Yemen and Somalia are not included in this particular exception due to security and documentary concerns specific to those countries as documented on the Department of State Visa Reciprocity Schedules for these countries.

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4. Form I-765, Application for Employment Authorization filed under the (c)(8),¹³ limited (c)(11),¹⁴ and limited (c)(14)¹⁵ categories;
5. Form I-910, Application for Civil Surgeon Designation (only for physicians that are citizens or nationals of the United States);
6. Benefit requests filed by any alien who is an athlete or member of an athletic team, including the coaches, persons performing a necessary support role, and immediate relatives for the purpose of participating in the World Cup, Olympics, or other major sporting event as determined by the Secretary of State;
7. Benefit requests that are a priority for law enforcement and where ICE has requested USCIS take adjudicative action to uphold public safety or national security;
8. Benefit requests filed by aliens whose entry would serve a United States national interest;¹⁶
9. Benefit requests, as well as the associated underlying benefits, for any programs that are terminated or discontinued as a result of an Executive Order, Proclamation, Federal Register Notice, or Directive issued by the President, the Secretary of Homeland Security, or the USCIS Director; and
10. Automatic termination decisions for ancillary or related benefit requests when an alien is granted Legal Permanent Resident status or becomes a naturalized citizen.¹⁷

Within 90 days of this memorandum issuance, and in consultation with OP&S and the Fraud Detection and National Security Directorate, USCIS will prioritize a list for review, interview, and re-interview, and issue operational guidance.

Use

This policy memorandum is intended solely for the guidance of USCIS personnel in the performance of their official duties, but it does not remove their discretion in making adjudicatory decisions. It may not be relied upon to create any right or benefit, substantive or procedural, enforceable under law or by any individual or other party in removal proceedings, in litigation with the United States, or in any other form or manner.

¹³ See [8 CFR 274a.12\(c\)\(8\)](#). Only applies to *initial* (c)(8) filings. *Asylumworks v. Mayorkas* requires USCIS to process all initial Form I-765 filed under the (c)(8) category within 30 days.

¹⁴ See [8 CFR 274a.12\(c\)\(11\)](#). Form I-765 filed under the (c)(11) category exceptions only apply when the request comes from law enforcement because the alien is assisting law enforcement.

¹⁵ See [8 CFR 274a.12\(c\)\(14\)](#). Form I-765 filed under the (c)(14) category exceptions only apply when the request comes from law enforcement because the alien is assisting law enforcement.

¹⁶ For example, a benefit request filed by an alien whose entry into the United States would provide significant benefit to the United States may include, but is not limited to, a scientist or medical researcher working on a critical public health project, an engineer with specialized skills needed for a key infrastructure initiative, or someone with unique expertise supporting U.S. national security or economic interests. This is a case-by-case determination and requires approval from the headquarters of the adjudicative directorate or program office.

¹⁷ For example, when USCIS approves an individual's Form I-485, any associated or underlying applications, such as Form I-765, will be automatically terminated, as the benefit provided by the ancillary form is no longer necessary.

----- Forwarded message -----

From: **Caragozian, Emma (Schiff)** <Emma_Caragozian@schiff.senate.gov>

Date: Mon, Dec 22, 2025 at 4:51 PM

Subject: RE: From the Office of Senator Adam Schiff

To: [REDACTED]

Dear [REDACTED],

Thank you for your message.

Please see the following guidance from USCIS:

On December 2, 2025, USCIS issued [Policy Memorandum PM-602-0192, Hold and Review of all Pending Asylum Applications and all USCIS Benefit Applications Filed by Aliens from High-Risk Countries](#), which, among other things, directs the agency to place an adjudicative hold on pending benefit requests filed for aliens from countries listed in [PP 10949](#), regardless of entry date, while a comprehensive national security review is conducted.

This review is an agency-wide operational measure and reflects USCIS's exercise of its authority to investigate immigration benefit requests filed by aliens who may pose risks to the national security and public safety of the United States, as outlined in DHS Delegation of Authority 0150.1, issued June 5, 2003. During the review period, USCIS is conducting individualized, case-by-case security assessments and is requiring additional scrutiny where warranted, including interviews that may not be waived.

It is important to note that:

- The hold does not constitute a denial or revocation of any benefit;
- Each affected case will receive an individualized review; and
- The hold remains in effect until formally lifted by the USCIS Director through subsequent written direction.

Additionally, USCIS announced [Policy Alert PA-2025-26](#), which authorizes consideration of country-specific factors—such as identity document integrity and information-sharing limitations—as part of the discretionary analysis for affected benefit requests.

USCIS recognizes that these actions may result in processing delays; however, the agency has determined that such measures are necessary to ensure national security and public safety and to fully comply with governing law.

We will continue to monitor implementation of this policy and will provide updates as they become available.

Senator Schiff wholeheartedly disagrees with these cruel and arbitrary actions by President Trump. Please be assured that the Senator will continue to work with his colleagues to seek full and fair consideration of your case.

Please let me know if you have any further questions.

Sincerely,

Emma

Emma Caragozian | Constituent Services Representative

(she, her, hers)

U.S. Senator Adam B. Schiff

4111 W. Alameda Ave., Suite 608

Burbank, CA 91505

(818) 303-3841



The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

MOHAMMADREZA SAGHAFI, et al.
(See attached addendum)

(b) County of Residence of First Listed Plaintiff Prince George's Cnty
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Curtis Lee Morrison, Garrett Carter May, RED EAGLE LAW, L.C., 5256 S. Mission Rd., Ste. 135, Bonsall, CA 92003

DEFENDANTS

JOSEPH B. EDLOW, in his official capacity as Director of U.S. Citizenship and Immigration Services

County of Residence of First Listed Defendant Prince George's Cnty
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Table with 5 columns: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Insurance, Real Estate, Personal Injury, etc.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. § 1361; 5 U.S.C. § 555(b) § 706(1) et seq; 5 U.S.C. 706(2)(A) and (D); 8 U.S.C. § 1152(a)(1)(A); U.S. Constitution (Equal Protection)
Brief description of cause:
Plaintiffs challenge lawfulness of two USCIS policy memorandums responsible for the withholding of their Form I-485 adjudications

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE January 11, 2026 SIGNATURE OF ATTORNEY OF RECORD /s/ CURTIS LEE MORRISON

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

ADDENDUM TO CIVIL COVER SHEET**LIST OF SAGHAFI V. EDLOW PLAINTIFFS**

1. Mehrdad Shamskilani	43. Mohsen Faghihinezhad
2. Boshra Rezvanian	44. Tahere Shahidipour
3. A.S.	45. Seydall Naseri
4. Farid Alinejad Almachovan	46. Morteza Salimi
5. Sarina Faizy	47. Sahar Jomehpour
6. Shaheen Pouya	48. Sina Dehestani
7. Sadaf Jamalzadeh	49. Mostafa Rahgouy
8. Alozai Javed	50. Mehnaz Tabassum
9. Mohammadreza Saghafi	51. Behrad Moniri
10. Saba Tabatabaee	52. Sara Hoseingholizade
11. Reza Alimohammadi	53. Yalda Yazdani
12. Arezou Rahimi	54. Azin Vakilpour
13. Amir Ahmadi Zahrani	55. Eshagh Mohammadyari
14. Sarah Binas	56. Maryam Shayan
15. Maysam Qadimi Rabbani	57. Bahar Bakhshi
16. Raha Rahmani	58. Arsh Haj Mohamad Ebrahim Ketabforoush
17. Mehrdad Zandigohar	59. Rafi Zahedi
18. Shahrokh Paktinat	60. MohammadReza Alivand
19. Tarkan Ghaseminejad Dehkordi	61. S.A.
20. Kayhan Behdin	62. Hosna Rastegarpouyani
21. Efrem Brhane	63. Mohammad Rahiminejat
22. Pegah Jandaghimeibodi	64. Fistm Emhaye Teklay
23. Mehrdad Khezri Pour	65. Mohamad Zamini
24. Mina Mahmoodabadi	66. Saba Aslani
25. Milad Pooladsanj	67. Mohammad Khosravikia
26. Mehrnaz Motamed	68. Nima Alamatsaz
27. Reynaldo Aaron Marvez Blanco	69. Alexander Saavedra Melo
28. Augustina Rovira	70. Marjan Azin
29. Shahram ArsangJang	71. Nasrin Haghighinajafabadi
30. Asiyeh Bakhtiyarkahriz	72. Mohammad Eskandari
31. O.A.	73. Sahar Rostami
32. D.A.	74. Saman Rahmati
33. Mohammadkazem Meidani	75. Sina Shariati Samani
34. Seyedeh Parshin Shojaee	76. Hasan Hadid
35. Mohammad Dehghan Rouzi	77. Fatima Abdou
36. Sanaz Nazari	78. Fatemeh Mottaghian
37. Negin Alizadehvandchali	79. Mladen Djekic
38. Faridoon Mohammadi	80. Alireza Salemi
39. Arman Adibi	81. Vahid Barzegar
40. Sabiha Tajdari	82. Poorya Mirkhosravi
41. Mohsen Sadeghi	83. Nazila Rahimi
42. Bahareh Rahimi	