

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner

No. 2:25-cv-00374

v.

Oral Argument Requested

DONALD J. TRUMP, et al.,
Respondents

**Motion for Preliminary Injunctive Relief Restoring Ms. Öztürk's SEVIS
Record**

INTRODUCTION

At the May 9, 2025 bail hearing, this Court ordered Rümeysa Öztürk's release after finding she had raised substantial claims that her detention violated the First Amendment and due process. ECF 140 at 17, 19-20; May 9, 2025 Tr. 107:22-23. The Court noted that Ms. Öztürk is "totally committed to her academic career" and anticipated that upon release she would fully resume her academic life, including teaching. May 9, 2025 Tr. 111:13-18, 112:9-12.

But notwithstanding Ms. Öztürk's release from detention, Immigration and Customs Enforcement (ICE) officials have not reactivated her record in the Student Exchange and Visitor Information System (SEVIS)—a database used to monitor the status of foreign students. ICE unlawfully terminated Ms. Öztürk's SEVIS record on March 25, hours after detaining her. In the two months since that termination first occurred, numerous courts have granted relief against terminations of students' SEVIS records, requiring the records to be restored. *See Parra Rodriguez v. Noem*, No. 3:25-CV-616, 2025 WL 1284722, at *8 (D. Conn. May 1, 2025) (collecting cases).

Preliminary injunctive relief is warranted here as well. As in other recent cases, the termination of Ms. Öztürk’s SEVIS record does not comply with any regulatory reason for termination of student status, and it is both contrary to law and arbitrary and capricious. *See Ortega Gonzalez v. Noem*, No. 6:25-CV-00622, 2025 WL 1355272, at *5-6 (D. Or. May 9, 2025). And the termination of Ms. Öztürk’s SEVIS record is unlawful for the additional reason that it constitutes impermissible retaliation for her protected speech. In addition to a likelihood of success on the merits of her claims, the equities weigh heavily in Ms. Öztürk’s favor. Reactivation of her SEVIS record is essential to Ms. Öztürk’s being able to return to the full range of her academic activities, and it does not interfere with the removal proceedings against her or with any legitimate government or public interest. Ms. Öztürk is accordingly entitled to preliminary injunctive relief requiring reactivation of her SEVIS record, and restoration of that record from the termination date to eliminate any gaps in the SEVIS record.

BACKGROUND

I. Rules governing F-1 students and SEVIS termination.

SEVIS is a database administered by ICE’s Student and Exchange Visitor Program (SEVP) and used to track foreign students, including those in F-1 student status. 8 U.S.C. § 1372(a)(1); 8 C.F.R. § 214.3(g); *see also* 9 FAM 402.5-4(A) (SEVIS “is designed to monitor the academic progress, movement, etc. of foreign students and exchange visitors from entry into the United States to departure”). The termination of a student’s SEVIS record prevents the student from being employed and has significant consequences for their ability to engage fully in academic life. French Decl. ¶¶ 18-19. It is permissible only for limited reasons, including the student’s failure to maintain status. *See Parra Rodriguez*, 2025 WL 1284722, at *4-5.

A. The F-1 Visa Process and SEVIS record.

U.S. immigration law authorizes granting F-1 visas to noncitizens to come to the United States temporarily to “pursue a full course of study” at a government-approved U.S. educational institution. 8 U.S.C. § 1101(a)(15)(F)(i); *see also* 8 C.F.R. § 214.1(a)(2). A foreign student who wishes to study in the United States in F-1 status can obtain that status either after being admitted to the country on an F-1 visa granted by the Department of State, 9 FAM 402.5-5(B), or after applying to U.S. Citizenship and Immigration Services to change their status from another temporary status in the United States to F-1 status, *see* 8 C.F.R. § 248.1(c); *see also* 8 C.F.R. § 214.2(b)(7).

In either scenario, the intending student must first be accepted by a SEVP-approved school. *See* 8 U.S.C. § 1372; 8 C.F.R. § 214.2(f)(1); 9 FAM 402.5-5(C).¹ The school must create a record for the intending student in the SEVIS system and complete an I-20 form within that system providing information about the student and the academic program they will pursue. 8 C.F.R. § 214.2(f)(1)(iii); 9 FAM 402.5-5(D); ICE Student Steps Site, *supra* n.1.² An intending student who is outside the United States prior to beginning their course of studies must—after being accepted into a SEVP-approved school, having the school complete the I-20, and paying a SEVIS fee—apply for an F-1 visa at a U.S. embassy or consulate. *See* 8 C.F.R. §§ 214.2(f)(1), (f)(19), 214.13; 9 FAM 402.5-5(B)-(D); ICE Student Steps Site, *supra* n.1. If granted a visa, the

¹ *See generally* ICE, *Student Process Steps: How to Navigate the U.S. Immigration System* (last visited May 23, 2025), <https://ice.gov/sevis/students> (“ICE Student Steps Site”); Department of State, *Student Visa* (last visited May 23, 2025), <https://travel.state.gov/content/travel/en/us-visas/study/student-visa.html>; USCIS, *Changing to a Nonimmigrant F or M Student Status* (last visited May 23, 2025), <https://www.uscis.gov/working-in-the-united-states/students-and-exchange-visitors/students-and-employment/changing-to-a-nonimmigrant-f-or-m-student-status> (“USCIS Changing Status Site”).

² *See also* Department of Homeland Security (DHS), *Study in the States, Create Initial COE (Form I-20)* (last visited May 23, 2025), <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/certificates-of-eligibility/create-initial-coe-form-i-20>.

intending student travels to the United States within 30 days of the start of their educational program. *See* 8 C.F.R. § 214.2(f)(5). If admitted by a U.S. immigration officer at a port of entry, the student is then in F-1 status. *See id.*³

Both students and approved educational institutions are regulated. The educational institution, for example, must agree to report to the U.S. government if an F-1 student stops attending the institution, as well as provide address and other information about the student. 8 U.S.C. §§ 1101(a)(15)(F)(i), 1372; 8 C.F.R. § 214.3(g). Each SEVP-approved school has a Designated School Official (DSO) that monitors and advises F-1 students. 8 C.F.R. §§ 214.2(f), 214.3(l); *see* Garson Decl. ¶ 1.

International students are also “subject to an array of regulations.” *Jie Fang v. Director U.S. Immigr. & Customs Enft.*, 935 F.3d 172, 175 (3d Cir. 2019) (citing 8 C.F.R. § 214.2(f)). For example, F-1 students must maintain a “full course of study” and comply with restrictions on employment. 8 C.F.R. §§ 214.2(f)(5), (f)(6), (f)(9); *see Parra Rodriguez*, 2025 WL 1284722, at *2. SEVIS is used to monitor and report whether international students are complying with the requirement to maintain a “full course of study” at an approved institution. 8 C.F.R. § 214.3(g). If a student is not attending their school, for example, the school is required to report that fact, *see* 8 U.S.C. § 1372(a)(4), (c)(1)(C); 8 C.F.R. § 214.3(g), and the DSO will terminate the student’s record in SEVIS.⁴

³ If the intending student is already in the United States in another temporary status, then after being accepted into a SEVP-approved school, having the school complete the I-20, and paying the SEVIS fee, the student may apply to USCIS to change to F-1 status. *See* 8 C.F.R. § 248.1(c); *see also* 8 C.F.R. § 214.2(b)(7); USCIS Changing Status Site, *supra* n.1. If that student is approved for F-1 status by USCIS but at some point travels abroad during their studies, they will need to apply for an F-1 visa at a U.S. embassy or consulate in order to re-enter the United States and continue their studies. French Decl. ¶ 11.

⁴ DHS Study in the United States, *SEVIS Help Hub: Terminate a Student* (last visited May 23, 2025), <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/terminate-a-student> (“DHS SEVIS Termination Site”).

B. Termination of the SEVIS record.

A SEVIS record may be terminated when a student fails to maintain or loses their F-1 status. By regulation, this occurs in only two circumstances. *See Saxena v. Noem*, No. 5:25-CV-05035, 2025 WL 1413266, at *7 (D.S.D. May 15, 2025); *Parra Rodriguez*, 2025 WL 1284722, at *4-5; *Doe No. 1 v. Noem*, No. 25-CV-1962, 2025 WL 1224783, at *2 (E.D. Pa. Apr. 28, 2025).

First, F-1 students fail to maintain their status when they do not comply with the terms of that status. Maintaining F-1 status requires “pursu[ing] a full course of study” at an approved institution. 8 U.S.C. § 1101(a)(15)(F)(i); 8 C.F.R. § 214.2(f)(5)(i), (f)(6). Like other visa holders, students in F-1 status must also abide by the terms of their status by not engaging in unauthorized work, not giving false information, and not being convicted of certain crimes. 8 C.F.R. §§ 214.1(e)-(g). An F-1 student may remain in the United States for as long as they continue to meet the requirements of their visa. 8 C.F.R. § 214.2(f)(5); *see Saxena*, 2025 WL 1413266, at *1. Termination of a SEVIS record based on a failure to maintain F-1 status is generally done by a school’s DSO, not by ICE. French Decl. ¶ 9; *see also* DHS SEVIS Termination Site.

Second, ICE may terminate a student’s status in specific limited circumstances. This may occur (1) if a specific waiver of inadmissibility was granted but later revoked; (2) if a private bill is introduced that would confer permanent resident status on the noncitizen; or (3) if a notice is issued in the Federal Register revoking the status due to “national security, diplomatic, or public safety reasons.” 8 C.F.R. § 214.1(d); *see also Jie Fang*, 935 F.3d at 185 n.100; *Doe No. 1*, 2025 WL 1224783, at *2, *5.

Termination of student status is distinct from the revocation of a visa. A visa is a document that is used to travel to the United States and seek admission to the country at

a port of entry, but it does not determine whether someone remains in valid status once in the United States. *See Sultan v. Trump*, No. 25-CV-1121, 2025 WL 1207071, at *2 (D.D.C. Apr. 24, 2025) (“An F-1 visa controls a noncitizen student’s entry into the United States, not their lawful status while in the country.”); French Decl. ¶ 11. For example, an F-1 student’s visa may expire or be terminated without any impact on their student status as reflected in SEVIS. Indeed, in 2010 ICE issued policy guidance acknowledging that a “[v]isa revocation is *not*, in itself, a cause for termination of the student’s SEVIS record.”⁵

II. The March 25, 2025 termination of Ms. Öztürk’s SEVIS record.

Ms. Öztürk began her PhD at Tufts University in February 2021. Garson Decl. Ex. 1. Her SEVIS record became “ACTIVE” on the day that she began her program and reflects that she continued to maintain her student status until March 25, 2025. *Id.*

At 7:32 p.m. on March 25, 2025—two hours after ICE arrested Ms. Öztürk—a user listed as “DHS Official” terminated her SEVIS record. Garson Decl. ¶ 3 & Exs. 1-2. SEVIS reflects that after this “Change of Student Status,” the “Resulting Status” was listed as “TERMINATED.” *Id.* Ex. 1. The termination reason was stated as “OTHERWISE FAILING TO MAINTAIN STATUS,” and the explanation states that the action happened “Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C. 1201(i)” —a reference to a provision of immigration law regarding visa revocation. *See* Garson Decl. ¶¶ 3-5 & Exs. 1-2.

At 9:18 a.m. and/or 9:19am on March 26, a “DHS Official” altered the reason for the termination to “OTHERWISE FAILING TO MAINTAIN STATUS,” without further

⁵ ICE Policy Guidance 1004-04 – Visa Revocations 3 (June 7, 2010), https://www.ice.gov/doclib/sevis/pdf/visa_revocations_1004_04.pdf (“ICE 2010 Policy Guidance”) (emphasis added).

details. *Id.* ¶ 8 & Exs. 1, 3. At 10:31am that morning, the SEVP program at ICE sent an email to Tufts University and to Ms. Öztürk (who was at that moment detained incommunicado en route to Louisiana). *Id.* ¶ 11. The email contained an attached “Termination Notice,” addressed to Ms. Öztürk, which stated that her SEVIS designation was “Terminated pursuant to 237(a)(1)(C)(i) and/or 237(a)(4)(C)(i) of the Immigration and Nationality Act.” *Id.* & Ex. 5. The former provision, 8 U.S.C. § 1227(a)(1)(C)(i), renders deportable a noncitizen who “has failed to maintain the nonimmigrant status in which the alien was admitted,” whereas the latter, 8 U.S.C. § 1227(a)(4)(C)(i), renders deportable a noncitizen “whose presence or activities in the United States the Secretary of State has reasonable ground to believe would have potentially serious adverse foreign policy consequences for the United States”

On April 8, Ms. Öztürk’s SEVIS record was again updated to reflect a third, new reason for termination. Garson Decl. ¶ 9 & Exs. 1, 4. Since that day, the reason for termination has been listed as “Other-Individual identified in criminal records check and/or has had their visa revoked. SEVIS record has been terminated.” *Id.* ¶ 12 & Ex. 1.⁶

Ms. Öztürk’s SEVIS record continues to be listed as “TERMINATED.” *Id.* Ex. 1. Following the May 15 status conference in this case, counsel for the government confirmed that ICE will not voluntarily reactivate Ms. Öztürk’s SEVIS record.

ARGUMENT

Ms. Öztürk is entitled to a preliminary injunction because (1) she “is likely to succeed on the merits” of her claim that ICE unlawfully terminated her SEVIS record,

⁶ It appears that on or around April 8, ICE began broadly using this termination reason. *See Liu v. Noem*, No. 25-CV-133, --- F. Supp. 3d ---, 2025 WL 1233892, at *4 (D.N.H. Apr. 29, 2025) (describing an April 8 change in the termination reason matching the change made in this case); Garson Decl. ¶ 10.

(2) she is “likely to suffer irreparable harm in the absence of preliminary relief,” and (3) “the balance of equities tips in [her] favor, and . . . an injunction is in the public interest.” *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008).⁷

I. Ms. Öztürk is likely to succeed on the merits of her claim that ICE unlawfully terminated her SEVIS record.

Ms. Öztürk is likely to succeed on the merits of her challenge to her SEVIS record termination on Administrative Procedure Act (“APA”) and First Amendment grounds.

A. The termination of Ms. Öztürk’s SEVIS record is both not in accordance with law and arbitrary and capricious.

The termination of Ms. Öztürk’s SEVIS record is a final agency action reviewable under the APA, *see* 5 U.S.C. § 704. *See Jie Fang*, 935 F.3d at 182-83.⁸ And Ms. Öztürk is likely to succeed on the merits of her claim that the termination is both not in accordance with law and arbitrary and capricious. *See* 5 U.S.C. § 706(2)(A).

First, the termination of Ms. Öztürk’s SEVIS record was not in accordance with law because no permitted regulatory reasons for terminating a SEVIS record existed. *See Doe v. Trump*, No. 25-CV-03140, --- F. Supp. 3d. ----, 2025 WL 1467543, at *9 (N.D. Cal. May 22, 2025); *Doe No. 1*, 2025 WL 1224783, at *5. The three specific scenarios in which ICE may terminate an F-1 visa holder’s status—the revocation of a waiver, the introduction of a private bill, or pursuant to a Federal Register notification—are not present here. 8 C.F.R. § 214.1(d). Ms. Öztürk did not need and thus did not receive any

⁷ Ms. Öztürk requests a prohibitory preliminary injunction, not a mandatory injunction, because she asks this Court to “maintain[] the status quo” by “restor[ing] her SEVIS record . . . to ‘the last peaceable uncontested status preceding the present controversy.’” *Parra Rodriguez*, 2025 WL 1284722, at *11 (quoting *JLM Couture, Inc. v. Gutman*, 91 F.4th 91, 105 (2d Cir. 2024)).

⁸ *See also, e.g., Parra Rodriguez*, 2025 WL 1284722, at *7 (holding termination of a SEVIS record is reviewable final agency action); *Doe v. Noem*, No. 3:25-CV-00023, 2025 WL 1161386, at *6 n.5 (W.D. Va. Apr. 21, 2025) (same); *Doe v. Noem*, No. 2:25-CV-00633, --- F. Supp. 3d ----, 2025 WL 1141279, at *3 (W.D. Wash. Apr. 17, 2025) (same).

waiver of inadmissibility to obtain a visa or gain admission to the United States; she is not the subject of any private bill; and DHS has not published a Federal Register notice.

In addition to these three specific scenarios, the only other permissible basis under the regulations for the termination of Ms. Öztürk's SEVIS record would be a failure to maintain a course of study or other failure to maintain her status. *See Parra Rodriguez*, 2025 WL 1284722, at *4-5; *Doe No. 1*, 2025 WL 1224783, at *5. But the records make clear that Ms. Öztürk was maintaining her status and continuing her course of study. *See* Garson Decl. Ex. 1. Nothing changed that could explain the termination of her SEVIS record on March 25 other than the government's decision to target and punish her for her speech.

Although ICE has at times cited revocation of Ms. Öztürk's visa by the Department of State as a basis in SEVIS for its termination of her record—although it did not do so in its March 26 communication purporting to notify Ms. Öztürk of the termination, *see* Garson Decl. Exs. 2-5—the revocation of a visa is not a basis for terminating a SEVIS record. *See* 8 C.F.R. § 214.1(d); ICE 2010 Policy Guidance.⁹ Instead, § 214.1(d) provides the three specific reasons that a person who has maintained their status may have that status terminated. These reasons include the revocation of a discretionary *waiver* that some noncitizens may need in order to obtain a visa, *see* 8 U.S.C. § 1182(d), but they do *not* include the revocation of that visa itself. *See* 8 C.F.R. § 214.1(d). As numerous courts have found in recent weeks, ICE may not terminate

⁹ On April 26, 2025, in an internal Broadcast Message that the government has submitted in some cases, ICE listed visa revocation as among the permissible bases for the termination of a SEVIS record. *See, e.g., Doe v. Noem*, No. 2:25-CV-00633-DGE, 2025 WL 1397007, at *2 (W.D. Wash. May 14, 2025); French Decl. ¶ 16. But this document did not purport to overturn ICE's published guidance, *see* French Decl. ¶ 16, and, in any event, it is inconsistent with § 214.1(d) to the extent it purports to create authority to terminate SEVIS records on the basis of a visa revocation. *See Doe*, 2025 WL 1397007, at *2 (the Broadcast Message "makes legal and factual claims that this Court and others have rejected").

SEVIS records unless a student has failed to maintain their status or a § 214.1(d) ground is present. *Parra Rodriguez*, 2025 WL 1284722, at *8 (collecting cases).

Second, the termination of Ms. Öztürk's SEVIS record was also arbitrary and capricious. Agency action is arbitrary and capricious if "the agency has relied on factors which Congress has not intended it to consider, entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Motor Vehicle Mfrs. Ass'n of the U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). That test is amply satisfied here. ICE has offered a shifting set of explanations for why Ms. Öztürk's SEVIS record was terminated, Gerson Decl. ¶¶ 6-11 & Exs. 1-5, none of them valid or supported by the facts. ICE has failed to consider Ms. Öztürk's and Tufts University's reliance interests, ignored Ms. Öztürk's maintenance of her status, and acted out of retaliatory motives. The termination of Ms. Öztürk's SEVIS record is thus arbitrary and capricious. *See Doe No. 1*, 2025 WL 1224783, at *5.

B. The termination of Ms. Öztürk's SEVIS record was retaliation for her protected speech, in violation of the First Amendment.

Ms. Öztürk is also likely to succeed on the merits of her First Amendment challenge to the termination of her SEVIS record. To succeed on her First Amendment retaliation claim, Ms. Öztürk must show that: "(1) [she] has a right protected by the First Amendment; (2) the defendant's actions were motivated or substantially caused by [her] exercise of that right; and (3) the defendant's actions caused [her] some injury." *Smith v. Campbell*, 782 F.3d 93, 100 (2d Cir. 2015) (cleaned up); *see Bello-Reyes v. Gaynor*, 985 F.3d 696, 700 (9th Cir. 2021). Just as this Court has already held that Ms. Öztürk

raised a substantial claim that her *detention* was unlawfully retaliatory—due to the un rebutted evidence that it was motivated by nothing other than her co-authorship of a 2024 op-ed concerning Israel’s war in Gaza—she is likely to succeed on the merits of her claim that the *termination of her SEVIS record* is unlawfully retaliatory as well.

This Court has already acknowledged that Ms. Öztürk has protected First Amendment rights. ECF No. 104 at 53. Indeed, the speech at issue in this case is political speech that lies “‘at the heart of First Amendment protection’ and ‘occupies the highest rung of the hierarchy of First Amendment values.’” *Ragbir v. Homan*, 923 F.3d 53, 70 (2d Cir. 2019) (cleaned up) (quoting *Snyder v. Phelps*, 562 U.S. 443, 451-52 (2011)), *cert. granted, remanded, and vacated sub nom. on other grounds, Pham v. Ragbir*, 141 S. Ct. 227 (2020)).

The Court has also acknowledged the strength of the evidence that retaliatory motivations for protected speech drove the government’s actions against Ms. Öztürk. It observed with regard to Ms. Öztürk’s detention that:

The record before this Court shows that the only speech at issue is Ms. Ozturk’s op-ed, and her arrest and detention clearly constitute adverse action. On April 18, the Court offered the government the opportunity to rebut Ms. Ozturk’s evidence showing that her op-ed is the but-for cause of her detention. ECF No. 104 at 56-58. The government has not done so. Meanwhile, Ms. Ozturk has introduced significant evidence demonstrating the irregular nature of the government’s actions. ECF No. 122 at 8. The Court therefore concluded that Ms. Ozturk has presented, at the very least, a substantial claim of a First Amendment violation.

ECF 140 at 17. The same is true of the government’s adverse action to terminate Ms. Öztürk’s SEVIS record—a separate, punitive measure taken by ICE that was distinct from and not required by the revocation of her visa. *See French Decl.* ¶¶ 11, 13. As this Court noted with regard to the government’s decision to “terminate her status” and take other adverse actions against Ms. Öztürk, “the government has not provided anything

beyond Ms. Ozturk's political speech" in defense of its actions, ECF 140 at 21, and Ms. Öztürk is likely to be able to demonstrate that they were retaliatory.

Finally, the SEVIS termination injured and continues to injure Ms. Öztürk. Even after this Court ordered Ms. Öztürk to be released with the understanding that she would return to her life at Tufts, the government continues to impede her full reintegration into her academic community through its termination of her SEVIS record. Ms. Öztürk is thus likely to prevail on her First Amendment claim.

II. Ms. Öztürk is likely to suffer irreparable harm if her SEVIS record is not restored.

Irreparable harm will result if Ms. Öztürk's SEVIS record is not promptly restored. As this Court noted, Ms. Öztürk is fully committed to and immersed in her academic life at Tufts University. May 9, 2025 Tr. 111:13-112:12. But if Ms. Öztürk's SEVIS record is not restored, Ms. Öztürk will suffer a "significant disruption" to her academic life. French Decl. ¶ 19.

Notably, if her SEVIS record is not reactivated, she will lose the opportunity for employment, including teaching, *id.*, and will therefore lose a source of financial support, *see* May 9, 2025 Tr. 39:5-15.¹⁰ This inability to engage in employment consistent with F-1 status constitutes an irreparable harm. *Oruganti v. Noem*, No. 2:25-CV-00409, 2025 WL 1144560, at *4 (S.D. Ohio Apr. 18, 2025) (noting "on-campus employment . . . make[s] up Plaintiff's only source of income . . . because, as an F-1 visa

¹⁰ At the May 9, 2025 hearing, the Court heard testimony that Ms. Öztürk had been previously scheduled to teach a summer course. *See* May 9, 2025 Tr. 39:9-12, 72:20-25. Ms. Öztürk and Tufts University have had to adjust these plans and now do not plan for Ms. Öztürk to teach that course. Nevertheless, Ms. Öztürk depends on other on-campus work opportunities and stipends to support herself financially during her graduate studies. *See id.* 39:5-15, 73:1-11.

holder, Plaintiff generally cannot work off-campus”); *see Doe 4 v. Lyons*, No. 2:25-CV-00708, 2025 WL 1208072, at *9 (W.D. Wash. Apr. 25, 2025).

On-campus work experiences are not only important for their financial value, but also as “an integral part of . . . doctoral training.” *Oruganti*, 2025 WL 1144560, at *4. For example, as Ms. Öztürk’s adviser testified, “teaching” is one of the “competencies” that Ms. Öztürk must satisfy as part of her studies. May 9, 2025 Tr. 68:18-69:10.

Moreover, SEVIS termination creates ongoing immigration consequences. SEVIS termination “triggers a negative impact even if the student did not engage in any activity that required termination and was not in violation of status” because “SEVIS is the sole location where comprehensive student status information is kept,” and the “SEVIS record is assumed to accurately reflect whether a student maintains status.” French Decl. ¶ 18. The failure to restore Ms. Öztürk’s record and to cure gaps in that record adds uncertainty to her present situation and will impact her prospects for any future immigration benefits in the United States. *Id.* ¶ 20; *see Doe v. Noem*, No. 2:25-CV-00633, --- F. Supp. 3d ----, 2025 WL 1141279, at *8 (W.D. Wash. Apr. 17, 2025) (noting government “could not confirm or deny if they consider Plaintiff to currently be out of status” and finding irreparable harm in the face of uncertainty and concern that Plaintiff “may . . . be accruing unlawful presence as a result of the SEVIS revocation”).¹¹

III. The balance of the equities tips in Ms. Öztürk’s favor, and an injunction is in the public interest.

The final two preliminary injunction factors, which merge when the government is the opposing party, also favor preliminary injunctive relief in this case. *See New York*

¹¹ *See also Doe*, 2025 WL 1467543, at *7 (finding gap and uncertainty in record created irreparable harm even where, unlike in Ms. Öztürk’s, record had been reactivated); *Parra Rodriguez*, 2025 WL 1284722, at *10 (finding even after reactivation of SEVIS record that 17-day gap was irreparable harm warranting preliminary injunctive relief).

v. U.S. Dep't of Homeland Sec., 969 F.3d 42, 59 (2d Cir. 2020). While Ms. Öztürk suffers concrete harms from not having her SEVIS record restored, the government has no legitimate interest in continuing to punish her through the unlawful and retaliatory termination of that status, and the public interest disfavors permitting these unlawful and retaliatory actions against Ms. Öztürk to continue. To the contrary, “there is substantial public interest in ensuring government agencies abide by federal laws and regulations.” *Parra Rodriguez*, 2025 WL 1284722, at *10 (granting preliminary injunction requiring restoration of SEVIS record as of date of termination).

Prior rulings in this case confirm that the balance of the equities favors injunctive relief. First, this Court has recognized the “extraordinary” nature of the government’s efforts to target Ms. Öztürk for her speech, which included terminating her student status. ECF 140 at 21. It held that the “nature and strength of Ms. Ozturk’s constitutional claims” were among the “extraordinary circumstances” supporting her release *pendente lite*. *Id.* at 27. That the government’s only basis for acting against Ms. Öztürk is her protected speech further underscores the public interest in providing her timely relief from the unlawful and retaliatory termination of her SEVIS record.

Second, prior rulings in this case have recognized that the harms of allowing the government’s conduct to continue pending litigation fall entirely on Ms. Öztürk. As the Second Circuit noted in denying a stay pending appeal of this Court’s transfer order, “[f]aced with such a conflict between the government’s unspecific financial and administrative concerns on the one hand, and the risk of substantial constitutional harm to Öztürk on the other, we have little difficulty concluding that the balance of hardships tips decidedly in her favor.” *Ozturk v. Hyde*, No. 25-1019, --- F.4th ---, 2025 WL 1318154, at *14 (2d Cir. May 7, 2025) (cleaned up). Like the transfer order, an order

requiring reinstating Ms. Öztürk's SEVIS record would have "no impact on the government's separate removal proceedings against her in immigration court," ECF 109 at 4, or on any legitimate government interest. Although "the executive branch assuredly has an interest in effectuating statutes enacted by the legislative branch, the judicial branch is charged with ensuring that the other branches do so in comport with the laws and the Constitution." *Id.* Here, once again, the balance of the equities and the public interest decidedly favor granting the preliminary injunctive relief necessary to allow Ms. Öztürk's full participation in her academic career.

CONCLUSION

For the foregoing reasons, this Court should grant preliminary injunctive relief that requires the government to reactivate Ms. Öztürk's SEVIS record and to restore it from the termination date to avoid any gaps in the record.¹²

/s/ Monica Allard
Lia Ernst
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¹² Particularly given the government's shifting positions with regards to students' SEVIS records, *see, e.g., Doe*, 2025 WL 1467543, at *4-5, *7, Ms. Öztürk reserves the right to seek additional or different relief relating to her SEVIS record and/or student status at a future date.

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**Admitted pro hac vice*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

RÜMEYSA ÖZTÜRK,
Petitioner

v.

No. 2:25-cv-00374

DONALD J. TRUMP, et al.,
Respondents.

DECLARATION OF ANNA GARSON

I, Anna Garson, declare as follows:

1. I am the Director of Tufts International Center and the Principal Designated School Official (PDSO) and Responsible Officer (RO) for Tufts University (“Tufts”). In my role, I oversee the administration of Tufts F-1 and J-1 visa programs and employment-based immigration processes for Tufts-sponsored faculty and staff. I also have access to and maintain F-1 student and J-1 exchange visitor records in the Department of Homeland Security’s Student and Exchange Visitor Information System (SEVIS). I have worked in this field for ten years and have served in this role since July 15, 2024.

2. I have personal knowledge of the contents of this declaration, or have knowledge of the matters based on my review of information and records gathered by Tufts University personnel, and could testify thereto.

3. On the evening of Tuesday, March 25, 2025, I learned that Rümeysa Öztürk, a Tufts doctoral student from Turkey and F-1 visa holder, was taken into custody by the Department of Homeland Security as she was leaving her off-campus apartment in Somerville, Massachusetts. Through subsequent review of Ms. Öztürk’s Student and

Exchange Visitor Information System (SEVIS) record, I learned that the record had been terminated by “DHS Official” that same evening at 7:32p.m. for the stated reason of “OTHERWISE FAILING TO MAINTAIN STATUS – Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C 1201(i).” Prior to the night of her arrest, Ms. Öztürk’s SEVIS record was in active status, and she had worked with her International Center Advisor/Designated School Official to complete the reporting requirements outlined for student-visa holders in 8 C.F.R. § 214.2(f).

4. A screenshot of the Event History page of Ms. Öztürk’s SEVIS record, which I took on March 25, 2025, is attached as Exhibit 1. It shows the expanded view of the March 25, 2025 SEVIS termination by the DHS official, with the stated reason for termination. I have redacted the names of four additional Tufts University Designated School Officials previously involved in SEVIS record updates for Ms. Öztürk from the “Performed By” column of the SEVIS Event History to protect their privacy due to the high-profile nature of Ms. Öztürk’s case.

5. A screenshot of the Student Information page of Ms. Öztürk’s SEVIS record, which I took on March 25 at or around 8:00 p.m., is attached as Exhibit 2.

6. Since the original “DHS Official” termination on the evening of March 25, 2025, additional changes have been logged to the termination reason provided by DHS in SEVIS. The SEVIS Event History page does not provide the ability to expand and see the details for each update, *see* Exhibit 1, however, through periodic review of the Student Information page of Ms. Öztürk’s SEVIS record, I have been able to capture screenshots that record these changes.

7. The first and initial SEVIS termination on March 25 indicated the aforementioned termination reason of “OTHERWISE FAILING TO MAINTAIN STATUS – Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C 1201(i).”

8. At 9:18 and 9:19a.m. on March 26, 2025, the Event History page for Ms. Öztürk’s SEVIS record reflects two entries by “DHS Official” to “Change Termination Reason.” *See* Exhibit 1. A screenshot that I took of the Student Information page of Ms. Öztürk’s record on March 28, 2025, attached as Exhibit 3, shows that after March 26, the termination reason was updated to “OTHERWISE FAILING TO MAINTAIN STATUS,” with further details removed.

9. The Event History Page for Ms. Öztürk’s SEVIS record also reflects a “Manual Data Change” by “SEVIS Maintenance” and shows that on April 8, 2025, the termination reason was altered to “OTHER - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.” A screenshot that I took of the Student Information page of Ms. Öztürk’s record on April 9, 2025, showing this updated termination reason, is attached as Exhibit 4.

10. I observed that subsequent students at Tufts University who had their SEVIS records terminated also had the termination reason “OTHER - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.”

11. In addition to these changes made in Ms. Öztürk’s SEVIS record, the morning after her arrest, on March 26, 2025, at 10:31a.m., I was copied on an emailed SEVIS Designation Termination Notice addressed to Ms. Öztürk from the Student and Exchange Visitor Program. The notice was backdated March 25, 2025, and stated that Ms. Öztürk’s

SEVIS designation had been terminated “pursuant to 237(a)(1)(C)(i) and/or 237(a)(4)(C)(i) of the Immigration and Nationality Act.” The notice also stated that if Ms. Öztürk remained in the United States, she may be contacted by immigration officials or placed in removal proceedings. At the time of receipt of this notice, Ms. Öztürk had already been detained and I now know that she was being transported to Louisiana. This notice is attached as Exhibit 5.

12. As of the date of this declaration, and despite Ms. Öztürk’s release from detention, the database shows that her SEVIS record remains terminated for the reason of “OTHER - Individual identified in criminal records check and/or has had their VISA revoked. SEVIS record has been terminated.” *See* Exhibit 1. Because her record remains terminated, I am unable to provide Ms. Öztürk with documentation of F-1 status nor am I able to make any updates to her F-1 record to reflect address changes, program updates, or other reporting requirements outlined for student-visa holders in 8 C.F.R. § 214.2(f).

13. Since Ms. Öztürk was taken into DHS custody on March 25, a total of two enrolled F-1 international students (Ms. Öztürk and one additional student) and seven post-graduation F-1 OPT (Optional Practical Training) participants from Tufts had their SEVIS records/F-1 status terminated by DHS. To date, seven of the nine terminated SEVIS records at Tufts University have been returned to active status—*i.e.*, everyone except Ms. Öztürk and one other person. Six reactivated records are F-1 visa holders who are alumni on post-graduation OPT (Optional Practical Training). The seventh reactivated record is a current student.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 21, 2025, at Tufts University.



ANNA GARSON

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT**

RÜMEYSA ÖZTÜRK,

Plaintiff,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 2:25-cv-00374

Declaration of Dahlia M. French, Esq.

I, Dahlia M. French, declare the following under pain and penalty of perjury:

1. I am over 18 years of age and am fully competent to make this declaration.

I have over 25 years of experience as a licensed immigration attorney. I earned my Juris Doctor in 1993, received bar admission in Connecticut (1993) and Ohio (1994) and have practiced immigration and international tax law since 1994. I am also admitted in the US Tax Court and the Federal District Court for the District of Northern Indiana.

2. Since obtaining my license in December of 1993, I have specialized in immigration law, and specifically in academic immigration. I have been a member of the American Immigration Lawyers Association (“AILA”) since January of 1998. As a member of AILA, I have served in various volunteer positions, including providing guidance to members on academic immigration issues, through practice advisories, speaking engagements, book chapter contributions, and answering direct questions on listservs. I am currently Managing Attorney in the law firm, French Legal.

3. I have been an active member of NAFSA: Association of International Educators, the most prominent national, professional organization for international student and scholar advisors for over 20 years. My activities with NAFSA include trainings, and guidance to members on academic immigration issues, through workshops, trainings, speaking engagements, and answering direct questions on listservs.

4. I practiced in private law from 1993 to 2005, then transitioned to in-house immigration roles at the University of Virginia, Vanderbilt University, and Texas Tech University Health Sciences Center, from 2005 to 2021. With 16 years leading immigration offices in higher education, I've served as a Designated School Official (DSO), Alternate Responsible Officer (ARO), and Responsible Officer (RO). My immigration law practice focuses on academic, medical, business, and family immigration, with expertise in F-1, J-1, and M-1 visa categories, their derivatives, and institutional sponsorship obligations — including detailed knowledge of the F-1 international student program, the Student & Exchange Visitor Information System (SEVIS), and the laws, regulations, and legal guidance related to SEVIS and international students in F-1 status.

5. I am a sought-after speaker at immigration webinars and conferences, provide expert advice and mentorship to colleagues, and have authored book chapters, journal articles, and practice advisories on academic immigration matters. I am considered a subject matter expert on academic immigration and issues affecting individuals in F-1, J-1, or M-1 status and the J-1 Exchange Visitor program.

6. F-1 nonimmigrant student status is available to noncitizens who pursue a course of study at an approved educational institution. An F-1 visa may be issued a U.S.

consulate to a student who has been accepted at a US college or university. The visa is issued in order to permit their travel to the United States. Once admitted at a U.S. port of entry, by US Customs and Border Protection (CBP), the student is issued an I-94 entry document as proof of lawful entry and status in the USA. The F-1 student reports to their school to and begin their academic program. The F-1 student must then fulfill certain requirements in order to maintain F-1 status.

7. To maintain status, F-1 students must follow specific requirements including: maintaining a full-time course load each semester, except when a reduced courseload is permitted; refraining from any unauthorized employment and only participating in authorized employment whether on-campus or off-campus; reporting to the DSO before taking any actions that affect the SEVIS record such as dropping to part-time status, taking medical leave, withdrawing from the program, and participating in academic internships; reporting to the DSO at the start of each session or semester or using whatever method the DSO requires to confirm enrollment each semester. *See* 8 U.S.C. § 1101(a)(15)(F)(i); 8 C.F.R. §§ 214.1(e)-(g), 214.2(f).

8. F-1 student status continues as long as the nonimmigrant continues to study in the USA and complies with the terms of their status. 8 C.F.R. § 214.1(f)(5). This is reflected on the entry record (the I-94) that an F-1 student receives when they are admitted into the country at a port of entry. Whereas, for example, the I-94 issued to someone entering the country on a tourist visa will contain a fixed end date by which they must leave the United States (typically six months after admission), an F-1 student's I-94 will have a "Duration of Status" or "D/S" annotation rather than a fixed end date. F-1 duration of status includes the periods in which the student is enrolled in school and maintaining status prior to receiving their degree, in addition to any periods of approved

post-degree completion employment authorization, *see* 8 C.F.R. § 214.2(f)(10)-(12) (allowing for post-degree practical training).

9. When a violation of status occurs, the DSO terminates the SEVIS record. I know of no situation where ICE terminated the SEVIS record instead of the DSO, except in the last two months.

10. US consulates have limited authority to revoke visas, including F-1 visas, and generally should provide notice prior to doing so. *See* 9 FAM 403.11-3(A)-(B) & 403.11-4(A)(1). The Department of State has given particular attention to situations in which someone is charged with a driving under the influence offense, 9 FAM 403.11-3(A)(4), 403.11-3(B), 403.11-5(B)(c). Prior to 2025, driving under the influence was the only scenario in which F-1 visa revocation commonly occurred. In my experience and to my knowledge, prior to 2025, consulates never revoked an F-1 visa for any other misdemeanor offenses or for other derogatory reasons.

11. F-1 visas and F-1 status are distinct. The purpose of a visa is to permit travel to the United States. An F-1 visa may expire while a student is in the United States in F-1 status, and the expiration of the visa does not impact their status. It only requires them to apply for and obtain a new visa the next time they travel abroad, in order to re-enter the United States. Sometimes a student changes status from another valid status to F-1 status while in the United States, and when that occurs, the student will have F-1 status but no F-1 visa. When that student travels outside the United States, they will then need to apply for an F-1 visa at the U.S. Embassy in order to return to the United States.

12. When a visa is revoked while someone is outside the United States, they will be unable to travel to the United States unless they apply for and obtain another visa. Visas may also be revoked while a noncitizen is inside the United States in very limited

situations. *See* 9 FAM 403.11-3(B)(b). When that occurs, if the noncitizen leaves the United States, they will be unable to return without being granted a new visa.

13. The revocation of a visa does not itself impact status in the United States. Both the Department of State and ICE have acknowledged that visa revocation has no effect on status.¹ ICE's 2010 guidance, for example, clearly states that even after visa revocation an F-1 student maintains status, and the agency will contact the DSO to confirm the student is maintaining status. Those statements are correct and F-1 students and their sponsoring schools have relied on them to provide guidance to students with visa revocations.

14. I know of no time, before 2025, that a visa revocation, even if done due a driving under the influence arrest or conviction, *see* 9 FAM 403.11-5(B)(c), led to termination of a SEVIS record. While the revocation of a visa has also been a deportability ground since 2004, I also know of no time before 2025 in which ICE relied on the revocation of a visa to detain someone or to put them into removal proceedings.

15. SEVIS is a record system used to monitor students in F-1 and M-1 status, as well as their dependent family members. SEVIS records are meant to accurately reflect whether a student is maintaining student status, although mistakes do occur.

16. I am aware of no time prior to 2025 when ICE terminated a SEVIS record solely due to visa revocation. This is because, by its own 2010 guidance, ICE knows that visa revocation does not equate to a loss of status or trigger SEVIS record termination,

¹ ICE/SEVP Policy Guidance 1004-04-Visa Revocations (June 7, 2010), https://www.ice.gov/doclib/sevis/pdf/visa_revocations_1004_04.pdf; U.S. Dept. of State Bureau of Educational and Cultural Affairs, Private Exchange Sector, Guidance Directive 2016-03: 9 FAM 403.11-3 – VISA REVOCATION (September 2, 2016), <https://www.aila.org/dos-guidance-directive-2016-03-on-visa-revocation>.

and termination of a SEVIS record on grounds of a visa revocation is improper. While on April 26, 2025, ICE sent an internal broadcast message listing visa revocation as among the potential bases for SEVIS termination, this internal email does not supercede the agency's guidance, which the agency has not rescinded. The agency has also not revised its public-facing information on the Study in the States website.²

17. The reasons to terminate a SEVIS record are clearly articulated in SEVIS guidance and regulations.³ Termination of a SEVIS record is appropriate when a student fails to maintain status, such as by not attending classes, by working in a manner not authorized by their status, by providing false information, or by engaging in criminal activity. 8 C.F.R. §§ 214.1(e)-(g), 214.2(f). Termination of a SEVIS record is also appropriate if a student's status has been terminated due to the reasons enumerated in 8 C.F.R. § 214.1(d), which include the circumstance where a waiver was granted in order to allow the student's admission and the waiver has been revoked. The terminations were conducted by the university in these situations, not ICE/DHS.

18. Termination of a SEVIS record—unless the reason for termination is that the student has become a lawful permanent resident or changed to another status—has serious consequences for the international student. Termination (except due to adjustment or change to another status) negatively impacts academic engagement and benefits, and future immigration status. A SEVIS record is assumed to accurately reflect

² SEVIS Termination Reasons, SEVP-Only Termination Reasons, <https://studyinthestates.dhs.gov/sevis-help-hub/student-records/completions-and-terminations/termination-reasons>.

³ Ibid. See also 8 C.F.R. 214.2(f)(5)(i)-(iv) where “Duration of Status” is defined: *the time during which an F-1 student is pursuing a full course of study at an educational institution approved by the Service for attendance by foreign students, or engaging in authorized practical training following completion of studies*. Duration of status continues through change in educational levels, school breaks and holidays, and for a 60-day period after academic studies and any post-graduation authorized practical training is completed.

whether a student maintains status, because the SEVIS is the sole location where comprehensive student status information is kept. Therefore, a SEVIS record termination (other than when it is due to an adjustment or change in status) always triggers a negative impact even if the student did not engage in any activity that required termination and was not in violation of status, and even if the termination was due to mistakes by a third party or government agency.

19. SEVIS record terminations (other than when they are due to adjustment or change to another status) are always a significant disruption to a student's academic program and progress. For example, students whose SEVIS record has been terminated are immediately unable to work in any on-campus and off-campus employment (including internships, mandatory clinical rotations, graduate research or teaching assistantships). In addition to the immediate loss of employment, additional negative consequences of SEVIS record terminations also include, but are not limited to, suspension of continued study at institutions that do not enroll undocumented students; loss of continued scholarship and grants, if those funds are tied to maintenance of F-1 status; and the potential inability to renew driver's licenses or state ID cards, because state databases use a federal verification system that confirms the SEVIS record is in Active status.

20. A SEVIS record termination (other than when it is due to adjustment or change to another status) also negatively affects a student's ability to obtain future immigration benefits. A violation of status must always be reported on a U.S. consulate visa application and on USCIS applications for immigration benefits. Students with a violation of status do not qualify for the U.S. visa waiver program, may be denied a visa, may be denied admission at a U.S. port of entry even with a visa, may be required to file

a nonimmigrant visa waiver application or to remain outside the U.S. for a number of years before being issued another visa. A violation of status even becomes a factor in the adjudication of future requests for permanent residence status.

21. I am not a party to this action or proceeding. I am aware of the facts stated herein of my own knowledge, and, if called to testify, I could and would competently so testify.

Executed on May 23, 2025, in Lubbock, TX.

A handwritten signature in black ink, appearing to read "D. French", written over a horizontal line.

Dahlia M. French, Esq.

EXHIBIT 1

Event History

F-1 Student

Ozturk, Rumeysa

Tufts University - Tufts University/Medford

Start Date: 02/01/2021 End Date: 12/23/2021

Status: **TERMINATED**

SEVIS ID:

| | | | |
|------------------|----------------|--------------|-------------|
| SEX | FEMALE | EMAIL | <div></div> |
| DOB | <div></div> | | |
| PREFERRED NAME | Rumeysa Ozturk | U.S. ADDRESS | <div></div> |
| PASSPORT NAME | | | |
| COUNTRY OF BIRTH | TURKEY | | |
| CITIZENSHIP | TURKEY | | |

Return

Expand All

Search:

Enter the date range and click the button to filter by event date

From: To:

Filter

| | Event Name | Event Date | Resulting Status | Performed By | | | | | | | | | |
|--------------------|--|---|------------------|--------------------|-----------|-----------|--------------------|--|--------------------------------------|-------------|--|---|--|
| <div>+</div> | Reinstatement Requested | 04/15/2025 16:02:51 | TERMINATED | Anna Garson-Angert | | | | | | | | | |
| | Manual Data Change | 04/08/2025 00:06:12 | TERMINATED | SEVIS Maintenance | | | | | | | | | |
| | ISS Change Termination Reason | 03/26/2025 09:19:07 | TERMINATED | DHS Official | | | | | | | | | |
| | ISS Change Termination Reason | 03/26/2025 09:18:31 | TERMINATED | DHS Official | | | | | | | | | |
| | ISS Change of Student Status | 03/25/2025 19:32:51 | TERMINATED | DHS Official | | | | | | | | | |
| <div>-</div> | Terminate - User Termination | 03/25/2025 19:32:51 | TERMINATED | DHS Official | | | | | | | | | |
| | <table><tr><th>Field Changed</th><th>Old Value</th><th>New Value</th></tr><tr><td>Termination Reason</td><td></td><td>OTHERWISE FAILING TO MAINTAIN STATUS</td></tr><tr><td>Explanation</td><td></td><td>Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C. 1201(i)</td></tr></table> | | | Field Changed | Old Value | New Value | Termination Reason | | OTHERWISE FAILING TO MAINTAIN STATUS | Explanation | | Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C. 1201(i) | |
| Field Changed | Old Value | New Value | | | | | | | | | | | |
| Termination Reason | | OTHERWISE FAILING TO MAINTAIN STATUS | | | | | | | | | | | |
| Explanation | | Pursuant to Section 221(i) of the Immigration and Nationality Act, 8 U.S.C. 1201(i) | | | | | | | | | | | |
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| <div>+</div> | Address Update - Physical | 01/04/2025 01:10:27 | ACTIVE | <div></div> | | | | | | | | | |
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| | Personal Information Updated | 09/28/2021 01:12:27 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | Address Update - Physical | 09/15/2021 03:28:16 | ACTIVE | <div></div> | | | | | | | | | |
| | Personal Information Updated | 09/15/2021 03:28:16 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | Telephone Information Updated | 09/15/2021 03:28:16 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | Registration - Continuing | 09/13/2021 14:27:55 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | ADIS Arrival | 09/06/2021 11:07:13 | ACTIVE | System Interface | | | | | | | | | |
| <div>+</div> | ADIS Departure | 07/21/2021 15:36:06 | ACTIVE | System Interface | | | | | | | | | |
| | I-20 Reprinted | 05/20/2021 12:19:23 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | Address Add - Physical | 02/16/2021 09:14:06 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | Registration - Initial | 02/16/2021 09:14:06 | ACTIVE | <div></div> | | | | | | | | | |
| <div>+</div> | ADIS Arrival | 01/16/2021 19:14:55 | INITIAL | System Interface | | | | | | | | | |
| <div>+</div> | NIV Interface | 12/14/2020 22:42:23 | INITIAL | System Interface | | | | | | | | | |
| | I-901 Payment | 11/23/2020 23:53:23 | INITIAL | System Interface | | | | | | | | | |
| | Record Created | 10/22/2020 01:07:50 | INITIAL | <div></div> | | | | | | | | | |

Return

EXHIBIT 2

Anna Garson-Angert Logou

ROLES: PDSO, RO

Get Plug-Ins

Enter SEVIS ID



y/Medford

d Date: December 23,

Status: **TERMINATED**

Status Change Date: March 25, 2025

SEVIS ID: [REDACTED]

I-20 ISSUE REASON: **CONTINUED ATTENDANCE**

TERMINATION REASON: **OTHERWISE FAILING TO MAINTAIN STATUS**

- Pursuant to Section 221(i) of the Immigration and Nationality Act, 8
U.S.C 1201(i)

U.S. Address

Address Status

Override - Other

Override ReasonDefault SIS Update of Address overridden

Foreign Address

EXHIBIT 3

View:

Event History

Request/Authorization Details

Employment Information

Actions:

Corrections

Request Reinstatement

Transfer Out

Student Information

| | | |
|-----------------|--|---|
| F-1 STUDENT | Tufts University - Tufts University/Medford | Status: TERMINATED |
| Ozturk, Rumeysa | Start Date: February 1, 2021 End Date: December 23, 2027 | Status Change Date: March 25, 2025 |
| | I-901 Fee Paid | SEVIS ID: [REDACTED] |
| | I-20 ISSUE REASON: CONTINUED ATTENDANCE | |
| | TERMINATION REASON: OTHERWISE FAILING TO MAINTAIN STATUS | |

Personal / Contact

| | |
|------------------------|---|
| Gender | U.S. Address |
| FEMALE | [REDACTED] |
| Date of Birth | Address Status |
| [REDACTED] Age 30 | Override - Other |
| City of Birth | Override Reason Default SIS Update of Address overridden |
| [REDACTED] | Foreign Address |
| Country of Birth | [REDACTED] |
| TURKEY | |
| Country of Citizenship | |
| TURKEY | |
| U.S. Telephone | |
| [REDACTED] | |
| Foreign Telephone | |
| | |
| Email Address | |
| [REDACTED] | |

Overall Remarks

Program

Education Level
DOCTORATE
Major 1 and Name
19.0706 - Child Development
Major 2 and Name
00.0000 - None
Minor and Name
00.0000 - None
Program Start Date
February 1, 2021
Program End Date
December 23, 2027

Registration

Initial Session Start Date
February 1, 2021
Current Session End Date
May 9, 2025
Next Session Start Date
September 2, 2025
Length of Next Break/Vacation
115
Last Session

Study/Research Abroad
No
Thesis/Dissertation
No

EXHIBIT 4

**SEVIS**Student & Exchange Visitor
Information System1-800-892-4829
SEVIS Help Desk

Anna Garson-Angel Logout

ROLES: PD90, RO

Get Plug-Ins

Home Listing of Schools Listing of Programs Message Board Change Password

Enter SEVIS ID

<< Return to Terminated Status Students (past 18 months)

View:

Event History

Request/Authorization Details

Employment Information

Actions:

Corrections

Request Reinstatement

Transfer Out

Student Information

F-1 STUDENT

Ozturk, Rumeysa

Tufts University - Tufts University/Medford

Start Date: February 1, 2021 End Date: December 23, 2027

Status: **TERMINATED**

Status Change Date: March 25, 2025

SEVIS ID: [REDACTED]

I-901 Fee Paid

I-20 ISSUE REASON: CONTINUED ATTENDANCE

TERMINATION REASON: OTHER - Individual identified in criminal records, check and/or has had their VISA revoked. SEVIS record has been terminated.

Personal / Contact

Gender

FEMALE

Date of Birth

[REDACTED] Age 30

City of Birth

[REDACTED]

Country of Birth

TURKEY

Country of Citizenship

TURKEY

U.S. Telephone

[REDACTED]

Foreign Telephone

[REDACTED]

Email Address

[REDACTED]

Overall Remarks**Program**

Education Level

DOCTORATE

Major 1 and Name

19.0706 - Child Development

Major 2 and Name

00.0000 - None

Minor and Name

00.0000 - None

Program Start Date

February 1, 2021

Program End Date

-

Registration

Initial Session Start Date

February 1, 2021

Current Session End Date

May 9, 2025

Next Session Start Date

September 2, 2025

Length of Next Break/Vacation

115

Last Session

Study/Research Abroad

EXHIBIT 5



U.S. Immigration and Customs Enforcement
Homeland Security Investigations
U.S. Department of Homeland Security
Potomac Center North
500 12th Street, SW MS-5600
Washington, DC 20536-5600

March 25, 2025

Rumeysa Ozturk
[REDACTED]

**Student and Exchange Visitor Program
SEVIS Designation Termination Notice**

This letter is to inform you that your Student and Exchange Visitor Information System (SEVIS) designation associated with SEVIS ID [REDACTED] issued by Tufts University - Tufts University/Medford, school code BOS214F00358000 has been Terminated pursuant to 237(a)(1)(C)(i) and/or 237(a)(4)(C)(i) of the Immigration and Nationality Act.

If you remain in the United States, you may be contacted by immigration officials or placed in removal proceedings.

Should you wish to speak to someone regarding this notice email at sevp@ice.dhs.gov

Sincerely,

Student and Exchange Visitor Program

CC: anna.garson@tufts.edu