

VIA EMAIL

April 14, 2025

U.S. Department of State  
Information Access Liaison Office, A/SKS/IAP/IAL  
2201 C Street N.W., Suite B266  
Washington, D.C. 20520-0000  
[FOIARequest@state.gov](mailto:FOIARequest@state.gov)

Dear Information Access Liaison Office,

This letter constitutes a request under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, and is submitted on behalf of the Electronic Privacy Information Center (“EPIC”) to the Department of State.

## Document Requested

EPIC seeks the following documents produced between January 20, 2025, and present:

- (1) Any email or other communication to, from, or cc Ross Glick, former executive director of Betar US, including any emails to, from, or cc [rossglick@gmail.com](mailto:rossglick@gmail.com) and any text messages to, from, or cc the telephone number 917.960.8273.
- (2) Any email or other communication to, from, or cc Daniel Levy, spokesperson for Betar US.
- (2) Any email to, from, or cc any email address
  - (i) ending in "betarus.org" or "canarymission.org" or
  - (ii) including the term "betar", "canarymission", "canary.mission", "canary-mission", "rossglick", "ross.glick", "ross-glick".
- (3) Any email, other communication, memorandum, or presentation containing any of the following terms: "Betar", "betarus.org", "Canary Mission", "canarymission", "canary.mission", "canary-mission", "canarymission.org", "Ross Glick", "rossglick@gmail.com".

## Background

On January 29, 2025, President Trump issued Executive Order 14188, announcing his intention to “us[e] all available and appropriate legal tools, to prosecute, remove, or otherwise hold

to account the perpetrators of unlawful anti-Semitic harassment and violence.”<sup>1</sup> In the last few weeks, the administration has begun implementing the EO by arresting and detaining several visa and green-card holders who have criticized US and Israeli actions in Gaza.<sup>2</sup> Others have been targeted by ICE and forced to flee the country because they spoke out about the humanitarian crisis in Gaza.<sup>3</sup>

Canary Mission and Betar are groups that have publicized information about individuals that criticize US and Israeli actions in Gaza.<sup>4</sup> Canary Mission has posted more than 2,000 online dossiers on its website since 2015.<sup>5</sup> On March 24, Canary Mission posted a new feature on its website, “Uncovering Foreign Nationals,” in response to President Trump’s recent executive order on combating antisemitism.<sup>6</sup> Three individuals who were either threatened with deportation or detained in the last month had appeared on the Canary Mission website.<sup>7</sup> One of them is Rümeyşa Öztürk, a Turkish graduate student at Tufts University, who was detained by masked federal agents on March 25, apparently for writing an op-ed criticizing the university’s response relating to the war in Gaza.<sup>8</sup>

Betar, a group that was labeled extremist by the Anti-Defamation League, has said that it shared with various administration officials a “deport list” of 3,000 immigrants who have spoken out for Palestinian human rights.<sup>9</sup> Betar claimed it was in contact with “prospective” Trump administration appointees in November,<sup>10</sup> and claimed in March to have shared “thousands of

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<sup>1</sup> *Id.* at § 2.

<sup>2</sup> Jake Offenhartz, *Immigration agents arrest Palestinian activist who helped lead Columbia University protests*, Associated Press (Mar. 9, 2025), <https://apnews.com/article/columbia-university-mahmoud-khalil-ice-15014bcbb921f21a9f704d5acdcae7a8>; Jake Offenhartz, Kathy McCormack, and Michael Casey, *Turkish student at Tufts University detained, video shows masked people handcuffing her*, Associated Press (Mar. 26, 2025), <https://apnews.com/article/tufts-student-detained-massachusetts-immigration-6c3978da98a8d0f39ab311e092ffd892>; Karina Tsui, *What we know about the federal detention of activists, students and scholars connected to universities*, CNN (April 2, 2025), <https://www.cnn.com/2025/03/31/us/what-we-know-college-activists-immigration-hnk/index.html>.

<sup>3</sup> Luis Ferré-Sadurní and Hamed Aleaziz, *How a Columbia Student Fled to Canada After ICE Came Looking for Her*, N.Y. Times (Mar. 15, 2025), <https://www.nytimes.com/2025/03/15/nyregion/columbia-student-kristi-noem-video.html>; Miles Klee, *Cornell University Ph.D. Student Leaves U.S. After Visa is Revoked Over Palestine Protests*, Rolling Stone (Apr. 1, 2025), <https://www.rollingstone.com/culture/culture-news/palestine-cornell-activist-visa-revoked-1235308276/>.

<sup>4</sup> Jon Levine, *Zionist org preps list of foreign pro-Hamas students, hoping Trump will deport them*, N.Y. POST (Nov. 23, 2024, 8:22 AM), <https://nypost.com/2024/11/23/us-news/zionist-org-preps-list-of-foreign-pro-hamas-students-hoping-trump-will-deport-them/>.

<sup>5</sup> Stephanie Saul, *A Mysterious Group Says Its Mission Is to Expose Antisemitic Students*, NY Times (April 1, 2025), <https://www.nytimes.com/2025/04/01/us/israel-gaza-student-protests-canary-mission.html>.

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> Jake Offenhartz, Kathy McCormack & Michael Casey, *Turkish student at Tufts University detained, video shows masked people handcuffing her*, AP News (March 26, 2025), <https://apnews.com/article/tufts-student-detained-massachusetts-immigration-6c3978da98a8d0f39ab311e092ffd892>.

<sup>9</sup> Stephanie Saul, *A Mysterious Group Says Its Mission Is to Expose Antisemitic Students*, NY Times (April 1, 2025), <https://www.nytimes.com/2025/04/01/us/israel-gaza-student-protests-canary-mission.html>.

<sup>10</sup> Jon Levine, *Zionist org preps list of foreign pro-Hamas students, hoping Trump will deport them*, N.Y. POST (Nov. 23, 2024, 8:22 AM), <https://nypost.com/2024/11/23/us-news/zionist-org-preps-list-of-foreign-pro-hamas-students-hoping-trump-will-deport-them/>.

names” with several high-ranking officials, including the Secretary of State, Marco Rubio.<sup>11</sup> The group claims to have collected “documentation, including tapes, social media and more” to support its deportation list designations.<sup>12</sup> Mahmoud Khalil and Momodou Taal, two student activists who were targeted for deportation by ICE, were reported to be on Betar’s list weeks before the administration took action against them.<sup>13</sup> Ross Glick, the previous spokesperson for Betar, said he discussed Mahmoud Khalil with Senator Ted Cruz days before his arrest.<sup>14</sup> On March 13, Betar posted what it called a “deport alert” aimed at Momodou Taal, a British-Gambian graduate student at Cornell University who has also been targeted by ICE.<sup>15</sup> The State Department moved to revoke Mr. Taal’s visa on March 14, the day after the alert was sent.<sup>16</sup>

Daniel Levy is the spokesperson for Betar US and has been quoted in the media admitting to sharing Betar’s deport list with administration officials.<sup>17</sup> Ross Glick was the executive director of Betar US until January, but has represented to the media that he is still providing administration officials with information about supporters of Palestinian human rights.<sup>18</sup> Glick’s personal website solicits information from the public about protesters, indicating that Glick is continuing to collect dossiers on protesters.<sup>19</sup> This website also lists his email address and phone number as modes of contact for information about protesters.<sup>20</sup>

The documents requested will reveal the communications, if any, the Department of State has had with these two organizations to inform decisions to arrest, detain, deport, or otherwise target individuals who are lawfully in the United States for engaging in constitutionally protected speech.

### **Request for Expedited Processing**

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<sup>11</sup> Anna Betts, *Pro-Israel group says it has ‘deportation list’ and has sent ‘thousands’ of names to Trump officials*, The Guardian (Mar. 14, 2024), <https://www.theguardian.com/us-news/2025/mar/14/israel-betar-deportation-list-trump>.

<sup>12</sup> *Id.*

<sup>13</sup> Alana Goodman, *Trump Pledged To Deport Pro-Hamas Student Visa Holders. Who Are They?*, Wash. Free Beacon (Feb. 11, 2025), <https://freebeacon.com/campus/trump-pledged-to-deport-pro-hamas-student-visa-holders-who-are-they/>.

<sup>14</sup> Anna Betts, *Pro-Israel group says it has ‘deportation list’ and has sent ‘thousands’ of names to Trump officials*, The Guardian (Mar. 14, 2024), <https://www.theguardian.com/us-news/2025/mar/14/israel-betar-deportation-list-trump>.

<sup>15</sup> Stephanie Saul, *A Mysterious Group Says Its Mission Is to Expose Antisemitic Students*, NY Times (April 1, 2025), <https://www.nytimes.com/2025/04/01/us/israel-gaza-student-protests-canary-mission.html>.

<sup>16</sup> *Id.*

<sup>17</sup> Will Oremus, *A militant Zionist group threatens activists online with a ‘deport list’*, The Washington Post (March 29, 2025), <https://www.washingtonpost.com/technology/2025/03/29/zionist-palestinians-deportations-x/>.

<sup>18</sup> Anna Betts, *Pro-Israel group says it has ‘deportation list’ and has sent ‘thousands’ of names to Trump officials*, The Guardian (Mar. 14, 2024), <https://www.theguardian.com/us-news/2025/mar/14/israel-betar-deportation-list-trump>.

<sup>19</sup> *E.g.*, Ross Glick, *We Demand the Trump Administration Enforce the F.A.C.E. Act : Stop Recurring Antisemitic Protests Targeting Synagogues* (Apr. 4, 2025), <https://www.rossglick.com/post/we-demand-the-trump-administration-enforce-the-f-a-c-e-act-stop-recurring-antisemitic-protests-ta>.

<sup>20</sup> <https://www.rossglick.com> (at footer).

EPIC requests expedited processing because (1) there is “an urgency to inform the public about an actual or alleged government activity” and (2) EPIC is “primarily engaged in disseminating information.”<sup>21</sup>

First, there is “an urgency to inform the public about an actual or alleged government activity.”<sup>22</sup> The EO announced an actual government activity—to “us[e] all available and appropriate legal tools, to prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.”<sup>23</sup> The administration has put the EO into action by targeting individuals who have criticized US policy toward Israel and Gaza—speech that is squarely protected under the Constitution. In one case, Mahmoud Khalil, a legal permanent resident of the U.S., was detained last month not for any alleged criminal conduct, but rather for his participation in demonstrations against Israel’s treatment of Palestinians.<sup>24</sup> Perhaps the most startling example is the administration’s ordering of plain clothed agents to abduct Rümeyşa Öztürk off the streets and render her to a Louisiana detention facility—all for publishing an op-ed in her university newspaper.<sup>25</sup>

The actions the administration has taken over the last several weeks to carry out the EO pose the greatest threat to First Amendment protections in generations. Free speech is enshrined in the Constitution. People in the United States should not be abducted off the streets for their speech. And yet, that is exactly what is happening. And if the administration thinks it can lawfully abduct Khalil and Öztürk for their speech, it may believe it can abduct *anyone*—US citizen and non-US citizen alike—who challenges the administration’s policy positions.

There is an urgency to inform the public what information the administration is using to decide which people to target for retaliation for their speech and whether the administration is colluding with private organizations to carry out investigations that the administration is otherwise unable to conduct itself because of the First Amendment. Canary Mission and Betar have produced and publicized lists of individuals that have spoken out about Palestinian human rights and have invited the administration to use these lists to target individuals for arrest, detention, and deportation. Öztürk was one of the individuals targeted online by Canary Mission before being forcibly detained. Betar has bragged about sharing lists of individuals to target with high-ranking officials in the

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<sup>21</sup> 22 C.F.R. § 171.12(d)(1)(ii).

<sup>22</sup> *Id.*

<sup>23</sup> EO at § 2.

<sup>24</sup> Jake Offenhartz, *Pressed for evidence against Mahmoud Khalil, government cites its power to deport people for beliefs*, Associated Press (April 10, 2025), <https://apnews.com/article/mahmoud-khalil-columbia-university-trump-c60738368171289ae43177660def8d34>.

<sup>25</sup> Jake Offenhartz, Kathy McCormack, and Michael Casey, *Turkish student at Tufts University detained, video shows masked people handcuffing her*, Associated Press (Mar. 26, 2025), <https://apnews.com/article/tufts-student-detained-massachusetts-immigration-6c3978da98a8d0f39ab311e092ffd892>.

current administration. Khalil and Taal were on a list Betar reportedly shared with prospective Trump administration officials months before their targeting.<sup>26</sup>

Second, EPIC is “primarily engaged in dissemination information.”<sup>27</sup> EPIC is a nonprofit research organization that distributes the records we obtain on our website or through our newsletter.<sup>28</sup> As the Court explained in *EPIC v. Dep’t of Def.*, “EPIC satisfies the definition of ‘representative of the news media.’”<sup>29</sup>

In submitting this request for expedited processing, EPIC certifies that this explanation is true and correct to the best of its knowledge and belief.<sup>30</sup>

### **Request for Fee Waiver**

A federal court has deemed EPIC a “representative of the news media” for fee classification purposes.<sup>31</sup> Based on EPIC’s status as a “news media” requester, EPIC is entitled to receive the requested record with only duplication fees assessed.<sup>32</sup>

Further, any duplication fees should also be waived because disclosure of the requested documents (1) is “likely to contribute significantly to public understanding of the operations or activities of the government” and (2) is “not primarily in the commercial interest” of EPIC.<sup>33</sup>

1. *Disclosure will contribute significantly to public understanding of the administration’s plans to target people lawfully in the US because of their speech.*

Disclosure of the documents sought will contribute significantly to public understanding of the administration’s retaliation campaign against those who have spoken out for the human rights of the Palestinian people. In determining whether the disclosure will contribute to the public understanding, the Department of State considers: (i) whether the subject concerns identifiable operations or activities of the federal government; (ii) whether disclosure of the records is meaningfully informative in order to be ‘likely to contribute’ to an increased public understanding; (iii) whether the disclosure contributes to the understanding of a reasonably broad audience, as opposed to the individual understanding of the requester; (iv) whether the public’s understanding of the subject in question is enhanced by the disclosure to a significant extent.<sup>34</sup>

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<sup>26</sup> Will Oremus, *A militant Zionist group threatens activists online with a ‘deport list’*, The Washington Post (March 29, 2025), <https://www.washingtonpost.com/technology/2025/03/29/zionist-palestinians-deportations-x/>.

<sup>27</sup> 22 C.F.R. § 171.12(d)(1)(ii).

<sup>28</sup> EPIC, *About EPIC* (2025), <http://epic.org/epic/about.html>.

<sup>29</sup> 241 F. Supp. 2d 5, 15 (D.D.C. 2003).

<sup>30</sup> 22 C.F.R. § 171.12(d)(2); 5 U.S.C. § 552(a)(6)(E)(vi).

<sup>31</sup> *EPIC v. Dep’t of Def.*, 241 F. Supp. 2d 5 (D.D.C. 2003).

<sup>32</sup> 5 U.S.C. § 552(a)(4)(A)(ii)(II); 22 C.F.R. § 171.16(a)(1).

<sup>33</sup> 5 U.S.C. § 552(a)(4)(A)(iii); 22 C.F.R. § 171.16(j)(1).

<sup>34</sup> 22 C.F.R. § 171.16(j)(2).

First, the request concerns “identifiable operations or activities” of the Department of State.<sup>35</sup> As explained above, the EO announced a new government activity—to identify, prosecute, and remove people who speak out about Palestinian human rights.<sup>36</sup> Betar has openly bragged about its role in helping the administration determine which student activists to target for deportation.<sup>37</sup> And the administration has been unable to point to any support for the attempted deportations except the students’ involvement in pro-Palestine protests. For instance, a memo submitted by Secretary of State Marco Rubio to an immigration judge made clear that Mahmoud Khalil was detained for his First Amendment-protected speech. According to Secretary of State Rubio’s memo, while Khalil was not charged with any criminal conduct and his participation in expressive activities protesting Israel’s actions in Gaza were “otherwise lawful,” letting him remain in the country would undermine “U.S. policy to combat anti-Semitism around the world and in the United States[.]”<sup>38</sup>

Second, this information will be meaningfully informative.<sup>39</sup> The requested documents will shed light on whether the Department of State made decisions to arrest, detain, or deport individuals based on information from Betar and Canary Mission and provide the public with a fuller understanding of the threat to First Amendment rights.

Third, EPIC’s request will contribute to the understanding of a reasonably broad audience because EPIC is a “representative of the news media”<sup>40</sup> and “it shall be presumed that a representative of the news media will satisfy this consideration.”<sup>41</sup> EPIC routinely publishes records from its FOIA requests on its website, and EPIC’s FOIA work is frequently covered by news outlets.<sup>42</sup>

Fourth, the disclosure will significantly enhance the public’s understanding of the activity. The agency has not publicly confirmed or disclaimed whether it relies on information obtained from Canary Mission or Betar to make immigration decisions.<sup>43</sup> The report would inform the public about the full scope of actions the agency may take to target people who speak out about Palestinian human rights, and the information on which they rely.

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<sup>35</sup> § 171.16(j)(2)(i).

<sup>36</sup> EO at § 3.

<sup>37</sup> Will Oremus, *A militant Zionist group threatens activists online with a ‘deport list’*, The Washington Post (March 29, 2025), <https://www.washingtonpost.com/technology/2025/03/29/zionist-palestinians-deportations-x/>.

<sup>38</sup> Jake Offenhartz, *Pressed for evidence against Mahmoud Khalil, government cites its power to deport people for beliefs*, Associated Press (April 10, 2025), <https://apnews.com/article/mahmoud-khalil-columbia-university-trump-c60738368171289ae43177660def8d34>.

<sup>39</sup> § 171.16(j)(2)(ii)(a).

<sup>40</sup> *EPIC v. Dep’t of Def.*, 241 F. Supp. 2d 5, 15 (D.D.C. 2003).

<sup>41</sup> 22 C.F.R. § 171.16(j)(2)(ii)(b).

<sup>42</sup> See EPIC, *EPIC in the News*, (2025) [https://epic.org/news/epic\\_in\\_news.php/](https://epic.org/news/epic_in_news.php/).

<sup>43</sup> Department Press Briefing – March 31, 2025, U.S. Dep’t of State (March 31, 2025), <https://www.state.gov/briefings/departments-press-briefing-march-31-2025/>; Stephanie Saul, *A Mysterious Group Says Its Mission Is to Expose Antisemitic Students*, NY Times (April 1, 2025), <https://www.nytimes.com/2025/04/01/us/israel-gaza-student-protests-canary-mission.html>.

2. *Disclosure is not primarily in the commercial interest because EPIC is a nonprofit seeking this information for public education.*

The disclosure is “not primarily in the commercial interest” of EPIC.<sup>44</sup> The Department of State considers two factors to determine whether this is met: (i) whether there is “any commercial interest of the requester...that would be furthered by the requested disclosure”; and (ii) whether the commercial interest is the “primary interest furthered by the request.”<sup>45</sup>

Under the first factor, EPIC has no commercial interest in the information. EPIC is a 501(c)(3) nonprofit dedicated to privacy, civil liberties, and open government. EPIC intends to use the requested information for public education and often publishes records obtained through the FOIA on its website. The request also satisfies the second factor because “the Department ordinarily will presume that when a news media requester has satisfied the requirements of paragraphs (j)(2)(i) and (ii) of this section, the request is not primarily in the commercial interest of the requester.”<sup>46</sup> As explained above, EPIC meets these criteria. EPIC is also a “representative of the news media.”<sup>47</sup>

For these reasons, EPIC’s request for a fee waiver should be granted.

## Conclusion

Thank you for your consideration of this request. EPIC anticipates your determination on our request within ten calendar days.<sup>48</sup> For questions and correspondence regarding this request contact Megan Iorio at [iorio@epic.org](mailto:iorio@epic.org) and Mayu Tobin-Miyaji at [tobin-miyaji@epic.org](mailto:tobin-miyaji@epic.org) cc: [FOIA@epic.org](mailto:FOIA@epic.org).

Respectfully Submitted,

*/s/ Megan Iorio*

Megan Iorio  
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*/s/ Mayu Tobin-Miyaji*

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EPIC Law Fellow

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<sup>44</sup> 22 C.F.R. § 171.16(j)(2)(iii).

<sup>45</sup> § 171.16(j)(2)(iii)(A)–(B).

<sup>46</sup> § 171.16(j)(2)(iii)(B).

<sup>47</sup> *EPIC v. Dep’t of Def.*, 241 F. Supp. 2d 5, 15 (D.D.C. 2003).

<sup>48</sup> 5 U.S.C. § 552(a)(6)(E)(ii)(I).