IALDF
IRANIAN AMERICAN LEGAL DEFENSE FUND

FOIA REQUEST FOR CBP RECORDS CONCERNING REMOVAL OPERATIONS OF IRANIAN NATIONALS, INCLUDING LAYOVER TRANSFERS VIA QATAR

November 19, 2025

Electronic Submission Via https://www.securerelease.us
U.S. Customs and Border Protection
Freedom of Information Act Office
1300 Pennsylvania Avenue NW, Mail Stop 1181
Washington, DC 20229

Re: FOIA Request for CBP Records Related to Deportation of Iranian Nationals (2025)

Dear FOIA Officer:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, and the implementing regulations of the Department of Homeland Security ("DHS") and U.S. Customs and Border Protection (CBP), the Iranian American Legal Defense Fund ("IALDF") submits this request for records related to the 2025 removal of Iranian nationals, including removals conducted through third-country "Layover Transfers" such as Qatar. The records sought include CBP's statutory roles in exit control, manifest maintenance, expedited removal processing, and aircraft clearance related to the removal of Iranian nationals.

IALDF is a nonprofit, non-commercial public-interest organization engaged in public legal advocacy, government oversight, and public education.

I.   Timeframe and Scope of Search

A. Timeframe and Subject Population

This request seeks records generated, modified, or maintained from January 1, 2025 through the date of processing this request. The agency's search must be diligent and extend beyond a single centralized repository to include all components likely to hold responsive records concerning removal operations and their associated legal vetting, contracts, and logistics.

The subject population is defined using the technical data fields available to CBP officers and enforcement systems. Specifically, the request targets records where the Country of Citizenship (CoC) is identified as Iran (CoC-IR) or the Country of Residence (CoR) is identified as Iran (CoR-IR), as logged within the Advance Passenger Information System (APIS) or Passenger Name Record (PNR) data sets.

Furthermore, the legal scope of the removal must include all forms of official departure facilitated or monitored by CBP:

1. **Removal:** Formal statutory deportations under the Immigration and Nationality Act (INA), often 8 U.S.C. § 1231.

2. **Expedited Removal:** Administrative removal procedures processed directly by CBP officers, typically at a Port of Entry or Border Patrol station (INA § 235(b)(1)).

3. **Voluntary Return:** Administrative departure where the non-citizen agrees to leave without a formal removal order, records of which CBP explicitly states it maintains.

B. Definitions

Table 1. To ensure a precise search using CBP's systems, the agency must use the following definitions:

Term	Precise Definition for Search Purposes
Iranian National	Any individual identified by CBP as a citizen or national of Iran (Islamic Republic of Iran) processed for removal, expedited removal, or voluntary departure or return via air transportation during the specified timeframe.
Removal Proceeding	Any administrative or enforcement action categorized by CBP as Expedited Removal (INA § 235(b)(1)), Voluntary Departure or Return, or documenting a final departure under a judicial/administrative Order of Removal.
Layover Transfer	A Removal Proceeding that utilizes a planned intermediate stop in a *third country* (e.g., Qatar) where custody is transferred to officials of the final destination country (Iran) or a third-party carrier for onward travel.

II.   Requested Records

The IALDF requests the following categories of records, with a special emphasis on the CBP systems of record (APIS, PNR, ADIS) and administrative clearance procedure (the categories below mainly target quantitative data, financial records, and logistical infrastructure related to the removal of Iranian nationals).

Category 1.   Aggregate Statistical Data (CBP Systems of Record)

Our request prioritizes aggregate, non-personally identifiable statistical data to maximize transparency while mitigating individual privacy concerns (Exemption 7(C)).

1.1: **Advance Passenger Information System (APIS) and Arrival and Departure Information System (ADIS) Records**

All aggregated, non-personally identifiable statistical data from the Arrival and Departure Information System (ADIS) and the Advance Passenger Information System (APIS) showing the numerical count of Iranian nationals who were recorded as departing the U.S. under any official Removal Proceeding between January 1, 2025, and the date of processing.

Required Breakdown: This data must be aggregated and segregated by:

- Aggregate monthly counts of individuals logged in the ADIS or APIS who meet the dual criteria: A. Country of Citizenship (CoC-IR) or the Country of Residence (CoR-IR), AND B. Travel Status (Removed Alien (statutory removal or administrative expedited) or Voluntary Departure or Return).
- A breakdown of these counts segregated by the U.S. Port of Departure, the Destination Country recorded in the APIS manifest, and the Air Carrier Name (identifying contracted ICE Air carriers, military or government (US or foreign), or commercial carriers used for removal).
- Redacted manifest metadata logs (excluding personal identifying information protected under Exemption 7(C)) that correspond to known ICE Air removal flights listing Iran as the final or intermediate destination.

1.2: **PNR Status Data**

All internal CBP query results or operational reports summarizing PNR data where the Passenger Status field is tagged as "Removed Alien," "Voluntary Departure," or "Voluntary Return," and the Country of Citizenship or Residence is Iran (CoC-IR & CoR-IR) , spanning the defined time frame.

1.3: **CBP Voluntary Departure or Return Log.**

Numerical totals of Iranian nationals processed for Voluntary Departure or Return at any Port of Entry or Border Patrol Station, segregated by POE and month.

The table below summarizes the technical specifications required to execute a targeted query within CBP's systems.

Table II: Targeted CBP Systems and Data Fields for Iranian National Departures:

Record System	Data Field to Filter	Requested Output Format	Legal/Operational Justification

ADIS/APIS	Country of Citizenship or Residence (IR) & Departure Date	Aggregate Count (Monthly/Quarterly)	CBP's authoritative record for exit control/travel history.
PNR	Status Indicator: "Removed Alien"	Aggregate Count (Broken down by Departure POE)	Specific PNR tag isolates removal subjects from general travelers.
APIS Manifests	Carrier Name and Flight Number (Charter/Contract)	Metadata logs (Redacted Manifests)	Verification of final aircraft clearance procedures for non-scheduled flights.
CBP POE Logs	Voluntary Departure or Return	Numerical totals by POE and year	Specific records CBP maintains for administrative exits.

Category 2. **Operational Logistics**, **Aircraft Clearance** Records **and Exit Control Procedures**

These requests target the administrative records CBP is mandated to generate for the international departure of non-scheduled removal aircraft.

2.1: **Clearance Procedures for Removal Aircraft**

All records, logs, forms, notifications, sign-offs, or documentation generated by CBP Port Directors or their delegates granting "Clearance or permission to depart" (non-scheduled aircraft or otherwise) under 19 CFR § 122.64 for non-scheduled aircraft (General Aviation, Charter flights, or "other aircraft") that departed the U.S. and listed the Islamic Republic of Iran, or known third-country staging hubs (e.g., Qatar, Egypt), as the next destination.

2.2: **Flight Closeout Procedures.**

Any internal memoranda, checklists, or Standard Operating Procedures (SOPs) utilized by CBP officers at U.S. airports regarding the final manifest verification, aircraft inspection, and clearance processes for government-chartered flights, including records of "Flight Closeout and Departure" verification.

2.3: **Redacted Manifest Metadata.**

Redacted manifest metadata logs (excluding personally identifiable information (PII) protected under Exemption 7(C)) corresponding to known ICE Air removal flights listing Iran or known transit hubs (e.g., Qatar) as the final or intermediate destination, which were required to be submitted to CBP's APIS system.

2.4: Records of Custody Transfer and Administrative Processing

While ICE manages formal detention, CBP maintains custody of non-citizens during processing at Border Patrol stations or Ports of Entry. The transfer of an alien from CBP custody to ICE Enforcement and Removal Operations (ERO) custody immediately prior to a scheduled removal flight is a critical juncture that requires specific documentation and procedure.

This request seeks specific internal documentation related to these initial administrative actions and custody transfers:

- Any Standard Operating Procedures (SOPs), memoranda, or directives detailing the required documentation or protocols for the physical transfer of custody of a non-citizen (alien) from CBP officials to ICE ERO or other entities (e.g., U.S. Marshals) immediately prior to boarding a removal flight.
- Specific record types utilized by CBP officers to document Voluntary Departure or Return processing or the issuance of a Notice and Order of Expedited Removal (Form I-860/I-862 equivalents) specifically issued to Iranian nationals at Ports of Entry during the relevant time period.

Category 3. Policy, Procedures, and Guidelines

These requests seek internal directives and guidelines governing how CBP officers interact with the subject population, nationals from specific "Countries of Concern" such as Iran and execute administrative removals.

3.1: Internal Directives on National Security and Country of Concern Processing

This FOIA requests the release of information regarding agency policies, procedures, and directives. Agencies must publish these guidelines unless a specific exemption applies.

The request targets:

- All CBP Directives, Handbooks, Memoranda, or Standard Operating Procedures (SOPs) issued between and that contain specific instructions, guidance, or procedures pertaining to the inspection, processing, or removal of individuals identified as Iranian nationals.
- Specific guidance related to the implementation of the Unified Secondary screening process concerning Iranian nationals. The Unified Secondary system is used to handle travelers referred from primary inspection, often due to national security or law enforcement alerts. Any documents detailing the criteria for enhanced scrutiny or referral based on national origin are critical.
- The full text of any directives or memoranda concerning the criteria for classifying Iranian nationals under specific security categories that trigger secondary inspection or

enhanced removal scrutiny, referencing compliance with federal statutes and guidelines.

3.2:   **Expedited Removal and Voluntary Departure or Return Policy.**

All current and rescinded CBP Directives, Operational Instructions, or Field Manual chapters, active between January 1, 2025, and the date of processing, governing the application of **Expedited Removal** (INA § 235(b)(1)) and **Voluntary Departure or Return** procedures specific to **Iranian Nationals** at Ports of Entry.

3.3:   **Credible Fear Referral Procedures.**

Any records detailing procedures for processing **Credible Fear Claims** initiated by Iranian nationals at a Port of Entry, including guidance on the referral process and documentation utilized.

Table III: Requested Policy and Guidance Documents (Non-Exempt Procedural)

Document Type	Target Subject	Relevant INA/CFR Context	Releasability Argument
Policy Directives / SOPs	Processing of Iranian Nationals	INA § 235(b)(1) (Expedited Removal)	Procedural guidance on administrative functions.
Guidance Memoranda	Transfer of Custody (CBP to ICE ERO)	19 CFR Part 122 (Departure Clearance)	Administrative coordination protocols.
Internal Manual Chapters	Voluntary Return Procedures	INA § 240B (Voluntary Departure)	CBP explicitly maintains records on Voluntary Return.
Instructions / Training Materials	Credible Fear Referrals for High-Risk POE Populations	INA § 235(b)	CBP Officers must refer (procedural clarity sought).

III.   Justification for Fee Waiver and Expedited Processing

A. Request for Fee Waiver (5 U.S.C. § 552(a)(4)(A))

The IALDF requests a full waiver of all search, review, and duplication fees pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). Disclosure of the requested information will contribute significantly to public understanding of the operations and activities of the Federal Government, as it details the

specialized, costly, and controversial logistical administration of forced removals to a country with high human rights concerns (Islamic Republic of Iran) directly or via **Layover Transfers** through third countries (such as Qatar). IALDF is a non-commercial, non-profit organization and will disseminate the information to the public at no cost.

B. Request for Expedited Processing (5 U.S.C. § 552(a)(6)(E))

Expedited processing is requested because the IALDF, as an organization engaged in education and disseminating information, has demonstrated a "compelling need" that meets the statutory standards:

- Imminent Threat to Life or Physical Safety: Failure to immediately obtain records regarding the official process for logging removals and the administrative policies governing the treatment of Iranian nationals prior to removal could reasonably be expected to pose an imminent threat to the life or physical safety of future or currently detained Iranian nationals facing removal to Iran, where persecution risks are high.
- Urgency to Inform the Public: The documentation surrounding the direct or "Layover Transfer" operation to the Islamic Republic of Iran and the existence of a broader agreement to deport at least hundreds of Iranian nationals is a matter of widespread public interest concerning potential questions about the government's integrity and compliance with non-refoulement obligations.

IV.   Requirements for Production and Segregability

A. Electronic Format:

All responsive records must be produced in their native electronic form or format, provided they are "readily reproducible by the agency in that form or format."

B. Segregability:

Pursuant to 5 U.S.C. § 552(b), CBP is required to release all reasonably segregable non-exempt portions of any records withheld. CBP must identify the location of deletions and the specific exemption cited.

C. A-Number Substitution:

If CBP attempts to withhold person-centric data (Category 1) using Exemption 7(C) to protect Alien Registration Numbers (A-Numbers), the agency is legally obligated to substitute those numbers with non-exempt, neutral Unique Identifying Numbers (Unique IDs) to afford the public access to the non-exempt operational data.

V.   <u>Conclusion</u>

We look forward to your determination on the request for expedited processing within 10 days, and the release of all responsive, non-exempt records within the statutory timeframe. If you have any questions, please contact me at ali.rahnama@ialdf.org or 202-339-1255.

Sincerely,

Ali Rahnama
Executive Director
Iranian American Legal Defense Fund (IALDF)