

Andre Y. Bates (SBN 178170) (aybates@dehengsv.com)
Keliang (Clay) Zhu (SBN 305509) (czhu@dehengsv.com)
Yi Yao (SBN 292563) (yyao@dehengsv.com)

DEHENG LAW OFFICES PC
7901 Stoneridge Drive, Suite 208
Pleasanton, CA 94588
T: 925-399-6702
F: 925-397-1976

Attorneys for Plaintiffs
Zhuoer Chen, Mengcheng Yu,
Jiarong Ouyang, and Gexi Guo

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ZHUOER CHEN, an individual; MENGCHENG
YU, an individual; JIARONG OUYANG, an
individual; and GEXI GUO, an individual;

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of the U.S. Department of Homeland
Security; and TODD LYONS, in his official
capacity as Acting Director of U.S. Immigration
and Customs Enforcement;

Defendants.

Case No. 3:25-cv-03292

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

I. INTRODUCTION

1. In early April 2025, the U.S. Department of Homeland Security (“DHS”), through U.S. Immigration and Customs Enforcement (“ICE”), initiated a sweeping and unprecedented wave of Student and Exchange Visitor Information System (“SEVIS”) terminations against hundreds if not thousands of international students with F-1 visas across the country.¹ SEVIS is a web-based system used by DHS to track and monitor information about nonimmigrant students and exchange visitors in the United States. Termination of their SEVIS records results in irreparable harm and causes a nationwide impact, as the affected students are required to leave the country immediately. They have to abruptly suspend their studies (one of the Plaintiffs is a month away from graduation), end housing arrangements or leases, lose employment authorization, face virtually insurmountable bars when re-entering the U.S. if they depart, and if they have any dependents, their dependents’ status is also terminated.

2. Without notice, explanation, or any form of due process, ICE terminated the student status of individuals who have done nothing more than maintaining academic standing and complying with their visa requirements. Some of the affected students were arrested but never charged or convicted of any offense; others received only minor traffic citations years ago. Many have no record whatsoever. These terminations have occurred without any consistent

¹ See Vimal Patel, Miriam Jordan, and Halina Bennet, *Nearly 300 Students Have Had Visas Revoked and Could Face Deportation*, N.Y. TIMES, Apr. 7, 2025, <https://www.nytimes.com/2025/04/07/us/student-visas-revoked-trump-administration.html>; Ely Brown, Erica Morris, and T. Michelle Murphy, *Harvard, UCLA, Stanford among schools across US reporting student visa revocations*, ABC NEWS, Apr. 7, 2025, <https://abcnews.go.com/US/harvard-ucla-stanford-schools-us-reporting-student-visa/story?id=120549032>; Annie Ma, *Colleges around the US say some international students’ visas are being revoked*, ASSOCIATED PRESS, Apr. 7, 2025, <https://apnews.com/article/fl-visa-international-college-student-trump-9d4d900d328a0c205503c1178e70f1d5>; Jessica Priest, *15 Texas A&M international students might have quietly lost their ability to stay in the U.S.*, THE TEXAS TRIBUNE, Apr. 8, 2025, <https://www.texastribune.org/2025/04/08/texas-am-international-students/>; Kelly Meyerhofer and Sophie Carson, *Over 2 dozen international students at University of Wisconsin System schools see visas revoked*, MILWAUKEE JOURNAL SENTINEL, Apr. 9, 2025, <https://www.jsonline.com/story/news/education/2025/04/09/student-visas-revoked-for-at-least-27-university-of-wisconsin-students/83008191007/>.

1 rationale or legal justification and are entirely arbitrary, violating the most basic principles of
2 fairness and due process.

3 3. Plaintiffs Zhuoer Chen, Mengcheng Yu, Jiarong Ouyang, and Gexi Guo are
4 highly accomplished international students who have lawfully pursued advanced degrees in the
5 United States under F-1 student status. In April 2025, ICE abruptly and unlawfully terminated
6 the SEVIS records of Plaintiffs and numerous others across the country, despite their full
7 compliance with immigration regulations, clean academic records, and, where applicable, the
8 formal dismissal of any prior legal issues. These terminations were issued without notice,
9 hearing, or legal justification, in violation of the Administrative Procedure Act (“APA”), the
10 Fifth Amendment and the Equal Protection Clause to the U.S. Constitution, and longstanding
11 agency policy.

12 4. The urgency of this action is reinforced by a recent decision in a closely related
13 case, *Liu v. DHS*, No. 1:25-cv-00133-LM (D.N.H. Apr. 7, 2025), where the U.S. District Court
14 for the District of New Hampshire granted a Temporary Restraining Order enjoining DHS from
15 enforcing a SEVIS termination against a doctoral student at Dartmouth College. The plaintiff in
16 that case, like the Plaintiffs here, had no criminal record, maintained full compliance with
17 academic and immigration regulations, and received no prior notice before his SEVIS record was
18 abruptly terminated. The court found that such conduct likely violated both the Due Process
19 Clause and the Administrative Procedure Act, emphasizing that visa revocation does not provide
20 a lawful basis for SEVIS termination under 8 C.F.R. § 214.1(d). This ruling illustrates the
21 widespread and unlawful nature of ICE’s actions and supports the need for immediate, system-
22 wide judicial relief.

23 5. This lawsuit seeks declaratory and injunctive relief to halt this unlawful pattern of
24 SEVIS record terminations, restore Plaintiffs’ legal status, and prevent further irreparable harm
25 to their educational trajectories, professional futures, and immigration standing. Plaintiffs
26 challenge ICE’s actions under the APA for being arbitrary, capricious, and contrary to law, and
27 assert that the lack of due process also violates their constitutional rights under the Fifth
28 Amendment and the Equal Protection Clause. At issue in this case is whether DHS and ICE may

1 unilaterally strip students of lawful status through SEVIS without legal authority, in defiance of
2 regulatory limits set forth in 8 C.F.R. § 214.1(d), and without affording any procedural
3 safeguards.

4 **II. JURISDICTION AND VENUE**

5 6. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331, 1346(b), and the
6 Administrative Procedure Act, 5 U.S.C. §§ 701 et seq. Venue lies in this District under 28 U.S.C.
7 § 1391(e), as Plaintiff Zhuoer Chen resides in and the actions complained of occurred in this
8 District.

9 **III. PARTIES**

10 7. Plaintiff Zhuoer Chen is a student of the Master of Architecture program at the
11 University of California, Berkeley and will graduate next month. She came to the U.S. from
12 China in 2017 to study civil engineering at USC and continued her education through graduate
13 studies in architecture. Her work focuses on reconciling urban design with wildlife habitat
14 preservation. She currently resides in Oakland, California.

15 8. Plaintiff Mengcheng Yu is a master's student in the Educational Technology and
16 Applied Learning Sciences program at Carnegie Mellon University ("CMU"), and currently
17 resides in Pittsburgh, Pennsylvania. She is a native of China who has lived in the U.S. since age
18 16, graduating from Bard College and New York University before enrolling at CMU. She is set
19 to graduate in August 2025. Her studies focus on the intersection of learning science and
20 interaction design, and she hopes to build a future in education and technology.

21 9. Plaintiff Jiarong Ouyang is a Chinese national. He is a doctoral candidate in
22 Statistics at the University of Cincinnati, and lawfully resides in Cincinnati, Ohio, having
23 maintained F-1 student status through his full-time enrollment and academic excellence. Mr.
24 Ouyang seeks to join this action to challenge the unlawful termination of his SEVIS record by
25 the Department of Homeland Security, which has jeopardized his education, his ability to
26 support his family, and his future professional opportunities in the United States.

27 10. Plaintiff Gexi Guo is a Chinese national who earned a Master of Science in
28 Applied Analytics from Columbia University in December 2022, and currently resides in New

1 York City under lawful F-1 status. He seeks to join this action to challenge the arbitrary and
2 unlawful termination of his SEVIS record, which jeopardizes his legal status, professional
3 trajectory, and personal commitments in the United States.

4 11. Defendant Kristi Noem is the Secretary of the Department of Homeland Security
5 and has authority over ICE and Student and Exchange Visitor Program (“SEVP”). She is sued in
6 her official capacity.

7 12. Defendant Todd Lyons is the Acting Director of ICE, responsible for SEVP. He is
8 sued in his official capacity.

9 **IV. LEGAL FRAMEWORK**

10 13. Under 8 U.S.C. § 1101(a)(15)(F)(i), noncitizens may enter and remain in the
11 United States in F-1 student status to pursue full-time study. The SEVIS system, managed by
12 DHS and ICE through SEVP, is used to track these students.

13 14. F-1 student status is distinct from the F-1 visa. A visa governs entry to the United
14 States; SEVIS status governs presence and eligibility to study while in the U.S. Once admitted in
15 F-1 status, students are allowed to remain in the country as long as they maintain compliance
16 with 8 C.F.R. § 214.2(f), including full-time enrollment, authorized employment, and proper
17 academic standing.

18 15. DHS regulations provide only limited grounds under 8 C.F.R. § 214.1(d) for
19 agency-initiated termination of status: (1) revocation of a waiver under INA § 212(d)(3) or (4);
20 (2) the introduction of a private bill in Congress to confer lawful permanent residence; or (3)
21 publication in the Federal Register of a finding that the termination is based on national security,
22 diplomatic, or public safety reasons.

23 16. ICE’s own guidance (Policy Guidance 1004-04) clearly states that visa revocation
24 alone does not justify SEVIS termination. If a visa is revoked after entry, a student may continue
25 their program of study and must simply obtain a new visa prior to re-entry after travel.

26 17. Plaintiffs bring this action under the APA and the Declaratory Judgment Act to
27 challenge ICE’s illegal termination of their SEVIS records.

28 ///

1 **V. FACTUAL ALLEGATIONS**

2 18. Noncitizens may enter the United States on an F-1 student visa to pursue full-time
3 study at DHS-approved academic institutions. Once admitted, they are granted F-1 student
4 status, which allows them to remain in the U.S. for the duration of their program, provided they
5 comply with federal regulations under 8 C.F.R. § 214.2(f), including maintaining a full course of
6 study and avoiding unauthorized employment.

7 19. The SEVP administers the F-1 program through SEVIS, a centralized electronic
8 system that tracks F-1 students. Schools must be SEVP-certified and assign Designated School
9 Officials (“DSOs”) who oversee compliance and report status changes in SEVIS.

10 20. F-1 students may engage in limited employment through Curricular Practical
11 Training or Optional Practical Training (“OPT”), both governed by regulation. Upon completing
12 their studies and training, students have a grace period to depart or transfer.

13 21. F-1 status may be lost in two ways: (1) by failing to comply with student visa
14 conditions (e.g., unauthorized employment), or (2) by agency-initiated termination. The latter is
15 governed strictly by 8 C.F.R. § 214.1(d), which limits such terminations to specific cases
16 involving national security or Congressional action. DHS policy affirms that visa revocation
17 alone does not justify SEVIS termination. Students may continue their studies after visa
18 revocation and need only obtain a new visa before traveling abroad and returning.

19 22. Students who fall out of status may apply for reinstatement under 8 C.F.R.
20 §214.2(f)(16), subject to strict conditions. However, SEVIS terminations carry immediate
21 consequences and are not reviewable by immigration judges, making lawful SEVIS management
22 critical to safeguarding students’ rights and status. Once a SEVIS record is terminated, the
23 student is deemed to be out of status and must depart the United States immediately. Failure to
24 do so triggers the accrual of “unlawful presence” under immigration law, which can result in
25 multi-year bars to reentry and severely affect the student’s ability to lawfully return to the United
26 States in the future. Because these consequences are immediate and irrevocable, and because
27 SEVIS terminations are not subject to review by an immigration judge, lawful and consistent
28 administration of SEVIS is essential to preserving due process and students’ legal rights.

1 23. In early April 2025, ICE began a sweeping and unexplained pattern of terminating
2 the SEVIS records of international students without notice, justification, or individualized
3 process. These terminations have affected hundreds if not thousands of students nationwide,
4 regardless of whether they had any adverse immigration or criminal history. University officials
5 were similarly left in the dark, reporting a surge in unexpected SEVIS terminations without any
6 prior warning from DHS or ICE. The scope and speed of this operation have created widespread
7 panic among students, many of whom remain in the United States unaware that their legal status
8 has been silently stripped from them.

9 24. The plaintiffs in this case—Zhaoer Chen, Mengcheng Yu, Jiarong Ouyang, and
10 Gexi Guo—are all law-abiding students who have never been convicted of any crime, let alone
11 one implicating public safety or national security. They have complied with the terms of their
12 student visas, maintained academic standing, and contributed to their schools and communities.
13 Some have had previous contact with law enforcement resulting in dismissed or expunged
14 charges, while others have no record whatsoever. There is no legal or factual basis for treating
15 these students as threats to public safety or grounds for removal. ICE’s decision to terminate
16 their SEVIS records is not only unlawful—it is unsupported by evidence, process, or reason.

17 25. Plaintiff Zhaoer Chen will complete her Master of Architecture at UC Berkeley in
18 May 2025. Her academic work centers on sustainable urban development, focusing on the
19 current living conditions of urban wildlife and exploring design-based strategies for their
20 improvement within the field of architecture. Since May 2024, she has interned at Livelarge
21 Home Inc., where she conducted planning research, drew up site plans, and supervised
22 installations of accessory dwelling units.

23 26. Despite this, on or about April 8, 2025, Ms. Chen received notice that her SEVIS
24 record was terminated by DHS, with no prior warning or opportunity to contest the decision. She
25 was not charged with a crime, and the only known incident in her record is an arrest for an
26 alleged physical altercation with her friend that resulted in no charges. No explanation or basis
27 for the termination has been provided.

28

1 27. Ms. Chen adopted two cats from a shelter in Los Angeles in 2017, and they have
2 been with her ever since. They are like family to her. One of them has a medical condition that
3 requires constant care.

4 28. Plaintiff Mengcheng Yu is pursuing a Master of Science in Educational
5 Technology and Applied Learning Science at Carnegie Mellon University (“CMU”). She has
6 maintained continuous legal presence since first arriving in the U.S. as a high school student in
7 2010. In 2015, she unknowingly enrolled in University of Northern New Jersey (“UNNJ”) which
8 turned out to be a federal sting operation, but cooperated with federal agents and later completed
9 a degree at New York University. She is a class member under the UNNJ settlement agreement,
10 which bars the government from using her enrollment in UNNJ as grounds for denial of
11 immigration benefits. She has no criminal record, not even an arrest.

12 29. After years of hard work, Ms. Yu was admitted to CMU in 2024 and is expected
13 to graduate in August 2025. Her SEVIS record was abruptly terminated in April 2025 without
14 any stated legal basis. This termination has jeopardized her studies and future work prospects.
15 ICE has provided no individualized notice or opportunity for review.

16 30. Plaintiff Mr. Jiarong Ouyang came to the United States in 2012 and earned both a
17 Bachelor of Science in Computing Statistics (2016) and a Master of Science in Applied Statistics
18 (2018) from the University of California, Riverside. He is currently a Ph.D. candidate in
19 Statistics at the University of Cincinnati, where he holds a GPA of 3.94 and is expected to
20 graduate in April 2026. His research focuses on Bayesian methods in variable selection, with
21 significant contributions to collaborative clinical research. His research has already produced one
22 co-authored journal article, with a second paper currently under peer review. In recognition of
23 his academic promise and contributions to the field, he was honored in 2024 with the Comer-
24 Reynolds Memorial Award by the Cincinnati Chapter of the American Statistical Association.
25 However, both of his ongoing research projects have been suspended due to the termination of
26 his SEVIS status.

27 31. Since May 2022, Mr. Ouyang has worked as a Graduate Assistant Intern at
28 Cincinnati Children’s Hospital Medical Center. In this role, he collaborates with physicians to

1 conduct exploratory data analysis and apply advanced statistical models to pediatric health
2 research.

3 32. In January 2019, Mr. Ouyang was arrested for an alleged domestic dispute
4 incident but was never convicted of a crime. The charges were formally dismissed. As a result of
5 the arrest, his visa was revoked, although he remained in lawful status. In the wake of the
6 dismissal, he successfully changed his status from F-1 to F-2 and later returned to F-1 status with
7 U.S. Citizenship and Immigration Services' ("USCIS") approval.

8 33. Despite his consistent compliance with immigration and academic regulations,
9 Mr. Ouyang's SEVIS record was abruptly terminated in April 2025. According to the University
10 of Cincinnati's international office, the termination was based on the previously dismissed arrest.
11 Mr. Ouyang received no prior notice, hearing, or opportunity to contest the decision.

12 34. Mr. Ouyang must remain in the U.S. to complete his degree, care for his wife and
13 young sons, and pursue professional opportunities in academia or the pharmaceutical industry.
14 The SEVIS termination has put all of this in jeopardy, despite his lawful conduct and substantial
15 academic and professional contributions.

16 35. Plaintiff Gexi Guo has spent the last eight years in the United States building a
17 life of academic and professional development. He earned a Bachelor of Science from
18 Pennsylvania State University and subsequently completed his graduate studies at Columbia
19 University graduating with a 3.8 GPA. His academic focus was applied analytics, with an
20 emphasis on data-driven strategy and operational efficiency.

21 36. Mr. Guo has worked as a Data Analyst Intern for the Columbia University and a
22 Data Scientist at iSoftStone. His responsibilities have included developing data ingestion
23 pipelines, automating analytics tools for project research, and designing cloud-based workflow
24 solutions for Fortune 500 clients. His professional work has supported international development
25 initiatives and corporate process improvement efforts.

26 37. Mr. Guo was arrested in May 2024 for an alleged simple assault. The charge was
27 dismissed and fully expunged by court order in August 2024 pursuant to N.J.S.A. § 2C:52-6. The
28 expungement order explicitly directs all law enforcement and government agencies to treat the

1 incident as though it never occurred. Despite this, his SEVIS record was terminated without
2 notice or an opportunity to be heard, based on conduct that has been judicially expunged and is
3 legally deemed not to have occurred.

4 38. In addition to his academic and professional responsibilities, Mr. Guo is the sole
5 caretaker of a dog and a cat. His immediate goal is to complete his current consulting and
6 research engagements while maintaining his lawful presence. The sudden and unexplained
7 SEVIS termination has placed his immigration status, his ability to fulfill professional
8 obligations, and ability to care for his pets in immediate jeopardy.

9 **VI. CLAIMS FOR RELIEF**

10 **FIRST CLAIM FOR RELIEF**

11 **(Administrative Procedure Act – Arbitrary and Capricious Agency Action)**

12 39. Plaintiffs reallege and hereby incorporate by reference the allegations contained in
13 the preceding paragraphs of this Complaint.

14 40. Defendants' termination of Plaintiffs' SEVIS records constitutes final agency
15 action reviewable under the Administrative Procedure Act, 5 U.S.C. §§ 701–706.

16 41. The terminations were arbitrary, capricious, and otherwise not in accordance with
17 law. Specifically, Defendants failed to provide individualized notice, failed to consider relevant
18 facts, and based their actions on impermissible grounds, including visa revocation, which is not a
19 lawful basis for SEVIS termination under 8 C.F.R. § 214.1(d).

20 42. Defendants' actions lack any rational connection between the facts and the
21 decision to terminate Plaintiffs' SEVIS records. The terminations were issued without
22 individualized review, factual findings, or explanation—hallmarks of arbitrary and capricious
23 agency action. Plaintiffs were not provided with any opportunity to respond, clarify their records,
24 or correct misinformation. In some cases, SEVIS records were terminated despite students
25 having clean records or arrests that resulted in dismissals and full expungement. DHS regulations
26 do not permit such blanket terminations based on speculative or irrelevant factors.

27 43. Furthermore, Defendants have acted inconsistently with long-standing agency
28 guidance, including ICE Policy Guidance 1004-04, which confirms that visa revocation alone

1 does not justify SEVIS termination. By failing to apply their own rules and precedents, and by
 2 acting without reasoned explanation or evidentiary support, Defendants have violated the APA's
 3 requirement that agency action be reasoned, consistent, and grounded in law. Plaintiffs are
 4 entitled to relief under 5 U.S.C. § 706(2)(A), which requires this Court to set aside unlawful and
 5 arbitrary agency action.

6 **SECOND CLAIM FOR RELIEF**

7 **(Administrative Procedure Act – Contrary to Constitutional Right)**

8 44. Plaintiffs reallege and hereby incorporate by reference the allegations contained in
 9 the preceding paragraphs of this Complaint.

10 45. By terminating Plaintiffs' SEVIS status without due process—without providing
 11 notice, explanation, or a meaningful opportunity to respond—Defendants violated Plaintiffs'
 12 constitutional rights.

13 46. Such action is unlawful under 5 U.S.C. § 706(2)(B).

14 47. The Due Process Clause of the Fifth Amendment prohibits the federal
 15 government from depriving individuals of life, liberty, or property without due process of law.
 16 Plaintiffs' lawful F-1 student status, once granted, constitutes both a liberty and property interest
 17 protected under the Constitution. It allows them to reside legally in the United States, engage in
 18 full-time education, and in some cases, work under authorized training programs. The abrupt
 19 termination of that status—without any notice or opportunity to be heard—violated the
 20 procedural safeguards to which Plaintiffs are entitled.

21 48. Defendants' failure to provide even the most basic procedural protections before
 22 stripping Plaintiffs of their lawful presence in the United States renders their actions contrary to
 23 constitutional right and in violation of 5 U.S.C. § 706(2)(B). Plaintiffs were given no opportunity
 24 to contest or clarify the basis for termination, were not served with a statement of reasons, and
 25 received no meaningful review. Agency actions that deprive individuals of constitutionally
 26 protected interests without affording due process are not only unlawful—they are void.

27 **THIRD CLAIM FOR RELIEF III**

28 **(Fifth Amendment – Procedural Due Process Violation)**

1 49. Plaintiffs reallege and hereby incorporate by reference the allegations contained in
2 the preceding paragraphs of this Complaint.

3 50. Plaintiffs have a constitutionally protected interest in their F-1 student status and
4 SEVIS records. Defendants' failure to provide any process prior to the deprivation of this
5 interest—no notice, no hearing, no opportunity to rebut—violated the Due Process Clause of the
6 Fifth Amendment.

7 51. The Supreme Court has long held that due process requires, at a minimum, notice
8 and an opportunity to be heard before the government may deprive a person of a significant
9 liberty or property interest. Plaintiffs' lawful F-1 student status is such an interest: it governs
10 their ability to reside in the United States, pursue academic goals, maintain employment
11 authorization, and avoid accrual of unlawful presence. The sudden termination of their SEVIS
12 records, without any prior warning or individualized assessment, deprived them of that interest
13 without affording even the most basic procedural protection

14 52. Defendants have provided no procedures—formal or informal—by which
15 Plaintiffs could challenge or appeal their SEVIS terminations. Plaintiffs were not told why they
16 were targeted, what evidence formed the basis of the termination, or how they might respond.
17 For many, the first notice of any issue came not from ICE or DHS, but from their universities
18 after the termination had already taken place. Such actions violate not only the letter of due
19 process law, but its core purpose: to guard against arbitrary government action and ensure
20 fairness in decisions that affect a person's fundamental rights.

21 **FOURTH CLAIM FOR RELIEF**

22 **(Violation of the Equal Protection Clause of the Fifth Amendment)**

23 53. Plaintiffs reallege and hereby incorporate by reference the allegations contained in
24 the preceding paragraphs of this Complaint.

25 54. The Fifth Amendment to the United States Constitution prohibits the federal
26 government from denying individuals equal protection of the laws. Although the Fifth
27 Amendment does not contain an equal protection clause in name, the Supreme Court has held
28

1 that its Due Process Clause incorporates the same protections against the federal government as
2 the Fourteenth Amendment provides against the states.

3 55. Defendants, acting under the color of federal law, have unlawfully discriminated
4 against Plaintiffs based on alienage, national origin, and/or race by arbitrarily terminating the
5 SEVIS records and lawful status of F-1 international students, most of whom are from China.
6 This pattern of targeting disproportionately affects students of Chinese nationality, despite the
7 absence of any individualized security threat, criminal conviction, or regulatory noncompliance.

8 56. The terminations appear to have been issued as part of a blanket enforcement
9 action, conducted without legal process, individualized review, or stated rationale. Many
10 students had no adverse record whatsoever; others had only minor incidents, such as dismissed
11 arrests or traffic violations, none of which legally justify termination under DHS's own
12 regulations. Yet ICE has treated them all alike, revoking their status while allowing similarly
13 situated students of other national origins to remain unaffected.

14 57. Defendants' actions constitute intentional or at minimum disparate-impact
15 discrimination based on alienage and national origin in violation of Plaintiffs' equal protection
16 rights under the Fifth Amendment. These terminations, and the policy or practice underlying
17 them, are not narrowly tailored to serve any compelling governmental interest, and they operate
18 in a manner that is overbroad, unsupported by evidence, and discriminatory in effect.

19 58. As a direct result of Defendants' discriminatory conduct, Plaintiffs have suffered
20 the loss of their lawful immigration status, risk of removal, forfeiture of educational and career
21 opportunities, reputational harm, emotional distress, and other irreparable injuries.

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Plaintiffs respectfully request that this Court grant the following relief:

24 1. Declaring that the termination of SEVIS status for Plaintiffs and all similarly
25 situated F-1 visa holders—who have not been convicted of any criminal offense, have
26 maintained academic standing, and are otherwise in compliance with the terms of their visa—
27 was unlawful, and that their SEVIS records and F-1 status shall be restored immediately;

28

1 2. Preliminarily and permanently enjoining Defendants from further SEVIS
2 terminations without lawful process;

3 3. Awarding costs and attorneys' fees pursuant to the Equal Access to Justice Act,
4 28 U.S.C. § 2412(b);

5 4. Granting such other and further relief as the Court deems just and proper.

6
7 Dated: April 11, 2025

Respectfully submitted,

8 **DEHENG LAW OFFICES PC**

9 /s/ Andre Y. Bates
10 Andre Y. Bates

11 *Attorneys for Plaintiffs*
12 *Zhuoer Chen, Mengcheng Yu,*
13 *Jiarong Ouyang, and Gexi Guo*