

# **EXHIBIT A**



United States Department of State

Washington, D.C. 20520

April 8, 2019

Case No. F-2018-06587

Mr. Leon Fresco  
Holland & Knight LLP  
800 17<sup>th</sup> NW Suite 1100  
Washington, DC 20006

Dear Mr. Fresco:

In response to your request dated August 28, 2018, under the Freedom of Information Act (the "FOIA"), 5 U.S.C. § 552, the Department has located four documents responsive to your request. After reviewing these documents, we have determined that all four may be released in full. All released material is enclosed.

Note that this material is responsive to the second option of the request because the first option would require the manual creation of a record, which is outside the scope of the FOIA. Instead, the data provided is from a similar report pulled from a Department database.

If you have any questions, you may contact Assistant United States Attorney, Paul Cirino, at (202) 252-2529 or [Paul.Cirino@usdoj.gov](mailto:Paul.Cirino@usdoj.gov). Please be sure to refer to the case number, F-2018-06587, and the civil action number, 19-cv-00282, in all correspondence about this case.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan C. Weetman for".

Susan C. Weetman  
Chief, Programs and Policies Division  
Office of Information Programs and Services

Enclosures: As stated.

The Freedom of Information Act (5 USC 552)

FOIA Exemptions

(b)(1) Information specifically authorized by an executive order to be kept secret in the interest of national defense or foreign policy. Executive Order 13526 includes the following classification categories:

- 1.4(a) Military plans, systems, or operations
- 1.4(b) Foreign government information
- 1.4(c) Intelligence activities, sources or methods, or cryptology
- 1.4(d) Foreign relations or foreign activities of the US, including confidential sources
- 1.4(e) Scientific, technological, or economic matters relating to national security, including defense against transnational terrorism
- 1.4(f) U.S. Government programs for safeguarding nuclear materials or facilities
- 1.4(g) Vulnerabilities or capabilities of systems, installations, infrastructures, projects, plans, or protection services relating to US national security, including defense against transnational terrorism
- 1.4(h) Weapons of mass destruction

(b)(2) Related solely to the internal personnel rules and practices of an agency

(b)(3) Specifically exempted from disclosure by statute (other than 5 USC 552), for example:

ARMSEXP	Arms Export Control Act, 50a USC 2411(c)
CIA PERS/ORG	Central Intelligence Agency Act of 1949, 50 USC 403(g)
EXPORT CONTROL	Export Administration Act of 1979, 50 USC App. Sec. 2411(c)
FS ACT	Foreign Service Act of 1980, 22 USC 4004
INA	Immigration and Nationality Act, 8 USC 1202(f), Sec. 222(f)
IRAN	Iran Claims Settlement Act, Public Law 99-99, Sec. 505

(b)(4) Trade secrets and confidential commercial or financial information

(b)(5) Interagency or intra-agency communications forming part of the deliberative process, attorney-client privilege, or attorney work product

(b)(6) Personal privacy information

(b)(7) Law enforcement information whose disclosure would:

- (A) interfere with enforcement proceedings
- (B) deprive a person of a fair trial
- (C) constitute an unwarranted invasion of personal privacy
- (D) disclose confidential sources
- (E) disclose investigation techniques
- (F) endanger life or physical safety of an individual

(b)(8) Prepared by or for a government agency regulating or supervising financial institutions

(b)(9) Geological and geophysical information and data, including maps, concerning wells

Other Grounds for Withholding

NR Material not responsive to a FOIA request excised with the agreement of the requester

C06715932

<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Afghanistan	75.6%
Albania	32.7%
Algeria	64.3%
Andorra	0.0%
Angola	19.6%
Anguilla	0.0%
Antigua and Barbuda	4.7%
Argentina	3.3%
Armenia	45.5%
Australia	1.6%
Austria	1.8%
Azerbaijan	33.2%
Bahamas, The	20.6%
Bahrain	5.1%
Bangladesh	33.6%
Barbados	2.6%
Belarus	11.5%
Belgium	0.4%
Belize	12.0%
Benin	80.3%
Bermuda	12.5%
Bhutan	54.9%
Bolivia	14.1%
Bosnia-Herzegovina	8.2%
Botswana	7.9%
Brazil	14.5%
British Virgin Islands	0.0%
Brunei	0.0%
Bulgaria	8.9%
Burkina Faso	73.3%
Burma	5.8%
Burundi	59.5%
Cabo Verde	43.9%
Cambodia	28.3%
Cameroon	85.2%
Canada	6.6%
Cayman Islands	4.1%
Central African Republic	70.0%
Chad	80.5%
Chile	2.4%
China - mainland	13.5%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
China - Taiwan	5.5%
Colombia	19.7%
Comoros	33.3%
Congo, Democratic Republic of the	69.0%
Congo, Republic of the	75.1%
Costa Rica	2.3%
Cote D'Ivoire	54.4%
Croatia	2.6%
Cuba	38.2%
Cyprus	1.1%
Czech Republic	3.5%
Denmark	0.4%
Djibouti	82.1%
Dominica	9.0%
Dominican Republic	28.2%
Ecuador	15.2%
Egypt	37.2%
El Salvador	15.2%
Equatorial Guinea	27.9%
Eritrea	76.2%
Estonia	9.2%
Eswatini	2.2%
Ethiopia	49.2%
Fiji	23.3%
Finland	1.6%
France	3.3%
Gabon	56.7%
Gambia, The	81.9%
Georgia	29.1%
Germany	1.3%
Ghana	47.9%
Gibraltar	0.0%
Great Britain and Northern Ireland	3.8%
Greece	8.0%
Grenada	4.9%
Guatemala	16.8%
Guinea	86.9%
Guinea - Bissau	0.0%
Guyana	10.3%
Haiti	52.5%
Honduras	19.2%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
British National (Hong Kong) Overseas Passport	3.3%
Hong Kong S. A. R.	7.7%
Hungary	2.3%
Iceland	2.7%
India	35.3%
Indonesia	11.7%
Iran	49.5%
Iraq	67.7%
Ireland	8.3%
Israel	6.7%
Italy	7.0%
Jamaica	18.5%
Japan	2.2%
Jordan	65.4%
Kazakhstan	44.0%
Kenya	43.1%
Kiribati	25.0%
Korea, South	4.1%
Kosovo	25.0%
Kuwait	1.9%
Kyrgyzstan	42.7%
Laos	41.8%
Latvia	8.2%
Lebanon	12.6%
Lesotho	17.4%
Liberia	62.4%
Libya	57.1%
Liechtenstein	0.0%
Lithuania	5.9%
Luxembourg	3.2%
Macau	6.8%
Macedonia	19.4%
Madagascar	14.6%
Malawi	40.5%
Malaysia	3.0%
Maldives	44.4%
Mali	82.2%
Malta	0.0%
Mauritania	72.6%
Mauritius	1.1%
Mexico	6.2%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Moldova	30.8%
Monaco	0.0%
Mongolia	66.1%
Montenegro	5.9%
Montserrat	0.0%
Morocco	54.5%
Mozambique	6.0%
Namibia	2.1%
Nepal	79.2%
Netherlands	2.9%
New Zealand	3.1%
Nicaragua	10.6%
Niger	53.1%
Nigeria	76.9%
*Non-Nationality Based Issuances	34.4%
Norway	0.4%
Oman	2.9%
Pakistan	56.5%
Palestinian Authority Travel Document	62.1%
Panama	2.7%
Papua New Guinea	8.5%
Paraguay	2.8%
Peru	24.3%
Philippines	37.4%
Poland	9.1%
Portugal	4.6%
Qatar	10.5%
Romania	6.6%
Russia	14.2%
Rwanda	33.6%
Samoa	0.0%
San Marino	0.0%
Sao Tome and Principe	0.0%
Saudi Arabia	12.2%
Senegal	67.4%
Serbia	14.2%
Seychelles	0.0%
Sierra Leone	71.4%
Singapore	1.3%
Slovakia	2.1%
Slovenia	3.3%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Solomon Islands	-33.3%
Somalia	37.2%
South Africa	13.3%
South Sudan	28.1%
Spain	3.4%
Sri Lanka	52.2%
St Lucia	3.1%
St. Kitts and Nevis	18.8%
St. Vincent and The Grenadines	23.5%
Sudan	56.0%
Suriname	0.0%
Sweden	4.6%
Switzerland	-0.1%
Syria	74.5%
Tajikistan	55.3%
Tanzania	21.5%
Thailand	40.3%
Timor-Leste	0.0%
Togo	76.3%
Tonga	64.3%
Trinidad and Tobago	15.2%
Tunisia	30.2%
Turkey	42.5%
Turkmenistan	66.5%
Turks and Caicos Islands	36.8%
Uganda	56.6%
Ukraine	43.5%
United Arab Emirates	3.0%
Uruguay	5.1%
Uzbekistan	72.1%
Vanuatu	33.3%
Venezuela	39.1%
Vietnam	43.7%
Yemen	78.6%
Zambia	24.4%
Zimbabwe	31.7%
<p><b>*"Non-nationality based issuances" includes individuals presenting travel documents issued by a competent authority other than their country of nationality, including, for example, aliens traveling on a Laissez-Passer issued by the United Nations and refugees residing in another country.</b></p>	



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<b>F1 Adjusted Refusal Rates by Nationality: FY 2018</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
<b>The Adjusted Refusal Rate is calculated as follows: (Refusals minus Waived/Overcome) divided by (Total Applicants minus Waived/Overcome). When there are more Waived/Overcome than refusals (for example, when refusals from a prior fiscal year are waived/overcome), the result is a negative adjusted refusal rate.</b>	
<b>Only nationalities that have data available during the indicated fiscal year are listed.</b>	

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Afghanistan	75.2%
Albania	44.5%
Algeria	63.6%
Andorra	0.0%
Angola	16.6%
Antigua and Barbuda	15.3%
Argentina	3.6%
Armenia	44.3%
Australia	1.5%
Austria	1.8%
Azerbaijan	37.0%
Bahamas, The	11.2%
Bahrain	9.5%
Bangladesh	53.7%
Barbados	8.3%
Belarus	14.6%
Belgium	1.1%
Belize	8.5%
Benin	76.9%
Bermuda	0.0%
Bhutan	43.8%
Bolivia	11.1%
Bosnia-Herzegovina	4.4%
Botswana	12.5%
Brazil	14.7%
British Virgin Islands	8.7%
Brunei	0.0%
Bulgaria	11.1%
Burkina Faso	79.4%
Burma	6.6%
Burundi	60.2%
Cabo Verde	40.0%
Cambodia	36.5%
Cameroon	75.0%
Canada	9.9%
Cayman Islands	3.1%
Central African Republic	72.5%
Chad	76.8%
Chile	2.7%
China - mainland	13.5%
China - Taiwan	5.2%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Colombia	11.8%
Comoros	50.0%
Congo, Democratic Republic of the	72.5%
Congo, Republic of the	70.8%
Costa Rica	1.6%
Cote D'Ivoire	54.2%
Croatia	1.8%
Cuba	57.9%
Cyprus	0.0%
Czech Republic	1.4%
Denmark	0.3%
Djibouti	81.0%
Dominica	12.9%
Dominican Republic	26.8%
Ecuador	14.6%
Egypt	38.5%
El Salvador	8.6%
Equatorial Guinea	9.6%
Eritrea	81.7%
Estonia	14.3%
Eswatini	3.2%
Ethiopia	59.4%
Fiji	8.7%
Finland	0.9%
France	2.1%
Gabon	42.7%
Gambia, The	90.7%
Georgia	20.9%
Germany	1.2%
Ghana	62.8%
Gibraltar	0.0%
Great Britain and Northern Ireland	4.4%
Greece	5.1%
Grenada	26.2%
Guatemala	11.6%
Guinea	88.3%
Guinea - Bissau	68.8%
Guyana	11.3%
Haiti	64.0%
Honduras	7.2%
British National (Hong Kong) Overseas Passport	2.6%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Hong Kong S. A. R.	4.4%
Hungary	3.4%
Iceland	0.4%
India	42.6%
Indonesia	10.4%
Iran	45.1%
Iraq	75.1%
Ireland	3.3%
Israel	3.9%
Italy	6.8%
Jamaica	13.5%
Japan	1.9%
Jordan	63.0%
Kazakhstan	32.1%
Kenya	41.3%
Kiribati	20.0%
Korea, South	6.6%
Kosovo	38.4%
Kuwait	10.5%
Kyrgyzstan	61.2%
Laos	29.2%
Latvia	6.7%
Lebanon	28.4%
Lesotho	15.4%
Liberia	57.7%
Libya	64.5%
Liechtenstein	0.0%
Lithuania	13.0%
Luxembourg	1.7%
Macau	9.4%
Macedonia	20.0%
Madagascar	28.3%
Malawi	31.3%
Malaysia	2.2%
Maldives	42.9%
Mali	83.9%
Malta	0.0%
Mauritania	78.6%
Mauritius	3.5%
Mexico	5.3%
Moldova	34.5%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Monaco	11.1%
Mongolia	70.7%
Montenegro	8.5%
Morocco	56.9%
Mozambique	7.0%
Namibia	7.8%
Nepal	77.2%
Netherlands	3.0%
New Zealand	1.4%
Nicaragua	14.4%
Niger	55.4%
Nigeria	63.6%
*Non-Nationality Based Issuances	38.1%
Norway	1.0%
Oman	3.4%
Pakistan	59.0%
Palestinian Authority Travel Document	65.6%
Panama	0.7%
Papua New Guinea	12.2%
Paraguay	1.3%
Peru	21.7%
Philippines	29.9%
Poland	6.1%
Portugal	4.5%
Qatar	7.5%
Republic of The Marshall Islands	0.0%
Romania	11.1%
Russia	11.1%
Rwanda	38.2%
Samoa	14.3%
San Marino	20.0%
Sao Tome and Principe	0.0%
Saudi Arabia	8.3%
Senegal	67.2%
Serbia	10.2%
Serbia and Montenegro	100.0%
Seychelles	0.0%
Sierra Leone	57.4%
Singapore	1.3%
Slovakia	6.9%
Slovenia	0.7%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Solomon Islands	50.0%
Somalia	64.4%
South Africa	8.4%
South Sudan	43.7%
Spain	3.9%
Sri Lanka	30.9%
St Lucia	10.6%
St. Kitts and Nevis	15.2%
St. Vincent and The Grenadines	6.7%
Sudan	56.3%
Suriname	4.3%
Sweden	4.6%
Switzerland	1.3%
Syria	63.9%
Tajikistan	62.4%
Tanzania	21.3%
Thailand	28.0%
Timor-Leste	0.0%
Togo	76.1%
Tonga	56.7%
Trinidad and Tobago	11.4%
Tunisia	24.3%
Turkey	35.2%
Turkmenistan	58.9%
Turks and Caicos Islands	14.3%
Uganda	39.1%
Ukraine	35.8%
United Arab Emirates	4.1%
Uruguay	3.6%
Uzbekistan	53.4%
Vanuatu	0.0%
Venezuela	35.7%
Vietnam	50.2%
Yemen	65.7%
Zambia	30.5%
Zimbabwe	27.5%
*"Non-nationality based issuances" includes individuals presenting travel documents issued by a competent authority other than their country of nationality, including, for example, aliens traveling on a Laissez-Passer issued by the United Nations and refugees residing in another country.	

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2017</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
<b>The Adjusted Refusal Rate is calculated as follows: (Refusals minus Waived/Overcome) divided by (Total Applicants minus Waived/Overcome). When there are more Waived/Overcome than refusals (for example, when refusals from a prior fiscal year are waived/overcome), the result is a negative adjusted refusal rate.</b>	
<b>Only nationalities that have data available during the indicated fiscal year are listed.</b>	

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2016</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Afghanistan	70.1%
Albania	45.8%
Algeria	49.3%
Andorra	0.0%
Angola	19.2%
Anguilla	0.0%
Antigua & Barbuda	9.3%
Argentina	2.3%
Armenia	53.7%
Australia	1.0%
Austria	1.3%
Azerbaijan	17.8%
Bahamas, The	11.7%
Bahrain	7.4%
Bangladesh	65.3%
Barbados	1.8%
Belarus	13.5%
Belgium	0.8%
Belize	9.1%
Benin	72.0%
Bermuda	21.3%
Bhutan	59.0%
Bolivia	12.0%
Bosnia-Herzegovina	9.2%
Botswana	5.7%
Brazil	14.1%
British Virgin Islands	5.7%
Brunei	0.0%
Bulgaria	13.5%
Burkina Faso	63.4%
Burma	9.2%
Burundi	67.9%
Cabo Verde	19.0%
Cambodia	32.8%
Cameroon	59.4%
Canada	6.4%
Cayman Islands	4.7%
Central African Republic	66.7%
Chad	63.9%
Chile	1.1%
China - mainland	11.7%
China - Taiwan	2.4%
Colombia	9.7%



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<b>F1 Adjusted Refusal Rates by Nationality: FY 2016</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Comoros	100.0%
Congo, Democratic Republic of the	66.7%
Congo, Republic of the	71.1%
Costa Rica	2.2%
Cote D'Ivoire	54.7%
Croatia	10.6%
Cuba	31.2%
Cyprus	1.6%
Czech Republic	2.8%
Denmark	0.4%
Djibouti	75.0%
Dominica	7.0%
Dominican Republic	21.1%
Ecuador	10.5%
Egypt	37.6%
El Salvador	17.4%
Equatorial Guinea	4.9%
Eritrea	70.3%
Estonia	25.7%
Eswatini	3.8%
Ethiopia	40.8%
Fiji	14.8%
Finland	0.0%
France	2.1%
Gabon	30.1%
Gambia, The	87.2%
Georgia	29.9%
Germany	1.7%
Ghana	70.2%
Gibraltar	50.0%
Great Britain & Northern Ireland	3.7%
Greece	7.3%
Grenada	14.7%
Guatemala	17.7%
Guinea	81.7%
Guinea-Bissau	55.6%
Guyana	8.6%
Haiti	60.3%
Honduras	8.2%
British National (Hong Kong) Overseas Passport	3.8%
Hong Kong S A R	5.8%
Hungary	9.1%
Iceland	0.0%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2016</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
India	49.5%
Indonesia	6.5%
Iran	51.1%
Iraq	68.5%
Ireland	1.6%
Israel	3.4%
Italy	5.3%
Jamaica	4.9%
Japan	2.7%
Jordan	63.8%
Kazakhstan	27.4%
Kenya	41.0%
Kiribati	0.0%
Korea, South	8.0%
Kosovo	37.4%
Kuwait	7.2%
Kyrgyzstan	60.2%
Laos	29.8%
Latvia	9.0%
Lebanon	29.1%
Lesotho	7.7%
Liberia	66.5%
Libya	71.8%
Liechtenstein	0.0%
Lithuania	9.8%
Luxembourg	1.4%
Macau	9.6%
Macedonia	25.6%
Madagascar	13.5%
Malawi	6.8%
Malaysia	2.0%
Maldives	40.0%
Mali	79.5%
Malta	11.1%
Mauritania	84.3%
Mauritius	0.0%
Mexico	3.9%
Moldova	32.6%
Monaco	0.0%
Mongolia	63.4%
Montenegro	11.1%
Montserrat	0.0%
Morocco	52.8%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2016</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Mozambique	9.1%
Namibia	3.9%
Nepal	70.7%
Netherlands	3.2%
New Zealand	0.8%
Nicaragua	11.5%
Niger	27.4%
Nigeria	57.0%
*Non-Nationality Based Issuances	39.5%
Norway	2.7%
Oman	0.7%
Pakistan	57.0%
Palestinian Authority Travel Document	59.3%
Panama	1.8%
Papua New Guinea	8.5%
Paraguay	3.7%
Peru	18.8%
Philippines	27.1%
Poland	5.6%
Portugal	2.9%
Qatar	2.8%
Republic of The Marshall Islands	33.3%
Romania	8.2%
Russia	8.0%
Rwanda	39.3%
Samoa	0.0%
San Marino	50.0%
Sao Tome and Principe	0.0%
Saudi Arabia	5.7%
Senegal	64.3%
Serbia	7.0%
Seychelles	0.0%
Sierra Leone	54.3%
Singapore	1.9%
Slovakia	1.6%
Slovenia	0.8%
Solomon Islands	0.0%
Somalia	51.9%
South Africa	9.2%
South Sudan	26.9%
Spain	2.4%
Sri Lanka	33.1%
St Lucia	12.2%

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2016</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
St. Kitts and Nevis	25.3%
St. Vincent and The Grenadines	16.3%
Sudan	37.7%
Suriname	0.0%
Sweden	3.3%
Switzerland	0.4%
Syria	64.6%
Tajikistan	60.3%
Tanzania	35.8%
Thailand	24.4%
Timor-Leste	0.0%
Togo	53.3%
Tonga	20.0%
Trinidad and Tobago	10.9%
Tunisia	28.4%
Turkey	30.0%
Turkmenistan	52.3%
Turks and Caicos Islands	36.0%
Uganda	30.6%
Ukraine	45.9%
United Arab Emirates	2.7%
Uruguay	2.4%
Uzbekistan	61.3%
Vanuatu	66.7%
Venezuela	17.1%
Vietnam	59.7%
Yemen	63.7%
Zambia	37.6%
Zimbabwe	28.6%
<p>*"Non-nationality based issuances" includes individuals presenting travel documents issued by a competent authority other than their country of nationality, including, for example, aliens traveling on a Laissez-Passer issued by the United Nations and refugees residing in another country.</p>	
<p>The Adjusted Refusal Rate is calculated as follows: (Refusals minus Waived/Overcome) divided by (Total Applicants minus Waived/Overcome). When there are more Waived/Overcome than refusals (for example, when refusals from a prior fiscal year are waived/overcome), the result is a negative adjusted refusal rate.</p>	
<p>Only nationalities that have data available during the indicated fiscal year are listed.</p>	

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<b>F1 Adjusted Refusal Rates by Nationality: FY 2015</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Afghanistan	59.2%
Albania	38.7%
Algeria	41.5%
Andorra	0.0%
Angola	16.0%
Anguilla	0.0%
Antigua & Barbuda	20.2%
Argentina	2.4%
Armenia	42.9%
Australia	1.3%
Austria	1.7%
Azerbaijan	36.4%
Bahamas, The	14.0%
Bahrain	5.4%
Bangladesh	63.8%
Barbados	3.6%
Belarus	12.2%
Belgium	1.2%
Belize	7.8%
Benin	50.8%
Bermuda	8.3%
Bhutan	43.9%
Bolivia	6.3%
Bosnia-Herzegovina	4.5%
Botswana	10.5%
Brazil	7.4%
British Virgin Islands	8.2%
Brunei	4.3%
Bulgaria	17.1%
Burkina Faso	48.9%
Burma	14.7%
Burundi	63.6%
Cabo Verde	1.7%
Cambodia	47.7%
Cameroon	60.8%
Canada	6.9%
Cayman Islands	0.0%
Central African Republic	63.6%
Chad	74.3%
Chile	0.8%
China - mainland	7.4%
China - Taiwan	5.0%
Colombia	6.7%

C06715953

<b>F1 Adjusted Refusal Rates by Nationality: FY 2015</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Comoros	100.0%
Congo, Democratic Republic of the	66.3%
Congo, Republic of the	68.6%
Costa Rica	2.5%
Cote D'Ivoire	49.3%
Croatia	3.1%
Cuba	51.0%
Cyprus	0.5%
Czech Republic	1.1%
Denmark	0.8%
Djibouti	69.2%
Dominica	4.4%
Dominican Republic	15.3%
Ecuador	7.8%
Egypt	36.8%
El Salvador	11.8%
Equatorial Guinea	28.2%
Eritrea	70.1%
Estonia	14.3%
Eswatini	4.5%
Ethiopia	49.6%
Fiji	5.9%
Finland	0.8%
France	2.7%
Gabon	16.8%
Gambia, The	88.1%
Georgia	35.6%
Germany	1.4%
Ghana	68.1%
Gibraltar	0.0%
Great Britain & Northern Ireland	2.0%
Greece	9.7%
Grenada	13.6%
Guatemala	14.1%
Guinea	73.7%
Guinea-Bissau	81.3%
Guyana	23.8%
Haiti	49.5%
Honduras	6.0%
British National (Hong Kong) Overseas Passport	7.9%
Hong Kong S A R	3.2%
Hungary	18.9%
Iceland	0.0%

C06715953

<b>F1 Adjusted Refusal Rates by Nationality: FY 2015</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
India	34.2%
Indonesia	5.5%
Iran	36.9%
Iraq	58.1%
Ireland	1.2%
Israel	4.7%
Italy	9.5%
Jamaica	9.4%
Japan	1.4%
Jordan	51.3%
Kazakhstan	19.6%
Kenya	39.7%
Kiribati	0.0%
Korea, North	50.0%
Korea, South	10.7%
Kosovo	40.4%
Kuwait	1.3%
Kyrgyzstan	61.5%
Laos	37.6%
Latvia	10.6%
Lebanon	23.2%
Lesotho	15.0%
Liberia	56.4%
Libya	56.0%
Liechtenstein	0.0%
Lithuania	13.1%
Luxembourg	1.4%
Macau	6.3%
Macedonia	27.9%
Madagascar	15.2%
Malawi	9.3%
Malaysia	2.0%
Maldives	27.3%
Mali	69.4%
Malta	0.0%
Mauritania	75.7%
Mauritius	0.0%
Mexico	3.0%
Moldova	43.6%
Monaco	0.0%
Mongolia	53.6%
Montenegro	7.1%
Montserrat	0.0%

C06715953

<b>F1 Adjusted Refusal Rates by Nationality: FY 2015</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
Morocco	47.3%
Mozambique	7.7%
Namibia	5.4%
Nepal	58.1%
Netherlands	2.7%
New Zealand	1.1%
Nicaragua	13.0%
Niger	36.6%
Nigeria	53.0%
*Non-Nationality Based Issuances	34.8%
Norway	1.5%
Oman	1.3%
Pakistan	48.0%
Palestinian Authority Travel Document	62.6%
Panama	2.5%
Papua New Guinea	7.6%
Paraguay	4.1%
Peru	9.1%
Philippines	27.5%
Poland	7.3%
Portugal	0.9%
Qatar	3.0%
Republic of The Marshall Islands	33.3%
Romania	14.2%
Russia	8.8%
Rwanda	42.7%
Samoa	0.0%
San Marino	0.0%
Saudi Arabia	5.7%
Senegal	69.5%
Serbia	7.7%
Serbia and Montenegro	0.0%
Seychelles	0.0%
Sierra Leone	59.4%
Singapore	0.8%
Slovakia	5.2%
Slovenia	0.7%
Solomon Islands	0.0%
Somalia	62.9%
South Africa	7.8%
South Sudan	35.9%
Spain	0.9%
Sri Lanka	26.5%



C06715953

<b>F1 Adjusted Refusal Rates by Nationality: FY 2015</b>	
<b>Nationality</b>	<b>Adjusted Refusal Rate</b>
St Lucia	19.7%
St. Kitts and Nevis	13.8%
St. Vincent and The Grenadines	6.3%
Sudan	45.6%
Suriname	2.5%
Sweden	2.6%
Switzerland	0.9%
Syria	75.5%
Tajikistan	68.3%
Tanzania	17.3%
Thailand	20.0%
Timor-Leste	10.0%
Togo	54.3%
Tonga	53.6%
Trinidad and Tobago	10.0%
Tunisia	25.8%
Turkey	26.6%
Turkmenistan	41.6%
Turks and Caicos Islands	20.0%
Tuvalu	0.0%
Uganda	24.5%
Ukraine	39.1%
United Arab Emirates	5.8%
Uruguay	1.0%
Uzbekistan	51.4%
Vanuatu	0.0%
Venezuela	13.2%
Vietnam	50.1%
Yemen	56.1%
Zambia	33.1%
Zimbabwe	30.3%
<p>*"Non-nationality based issuances" includes individuals presenting travel documents issued by a competent authority other than their country of nationality, including, for example, aliens traveling on a Laissez-Passer issued by the United Nations and refugees residing in another country.</p>	
<p>The Adjusted Refusal Rate is calculated as follows: (Refusals minus Waived/Overcome) divided by (Total Applicants minus Waived/Overcome). When there are more Waived/Overcome than refusals (for example, when refusals from a prior fiscal year are waived/overcome), the result is a negative adjusted refusal rate.</p>	
<p>Only nationalities that have data available during the indicated fiscal year are listed.</p>	

## **EXHIBIT B**

# Holland & Knight

800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564  
Holland & Knight LLP | www.hkllaw.com

Leon Fresco  
202 469 5129  
leon.fresco@hkllaw.com

April 8, 2021

## VIA FAX

U. S. Department of State  
Office of Information Programs and Services  
2201 C Street N.W., Suite B266  
Washington, D.C. 20520-0000  
FAX: (202) 485-1669

**Re: Freedom of Information Act – Request for *EXPEDITIOUS HANDLING***

**Request of F-1 Nonimmigrant Visa Refusal Statistics by Post and Nationality for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date)**

Dear Sir or Madam:

On behalf of my client, Shorelight Education, a leading education company focused on providing educational experiences for international students and partnering with U.S. universities as a clearinghouse for information, we are respectfully filing a Freedom of Information Act request seeking public information that is possessed by the State Department, but is not specifically provided to the public in the State Department's non-immigrant visa statistics.

Specifically, we seek the following information/data:

1. Each year, the State Department publicly releases a document that is titled as: "ADJUSTED REFUSAL RATE - B-VISAS ONLY BY NATIONALITY"  
See <https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/RefusalRates/FY19.pdf>

We seek the exact same statistics, in the exact same format, but for **F-1 student visas**. In other words, the numbers that would be provided would be for F-1 Student Visas instead of for B-visitor visas. We seek these statistics for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date)

2. Alternatively, if the data in Request Number 1 cannot be provided—and a lawful explanation is provided as to why this data cannot be provided—we respectfully ask that the State Department then refer to the annual document it publicly releases titled: "**Worldwide NIV Workload by Visa Category FY 2020.**"

State Department FOIA Request  
April 8, 2021  
Page 2

See <https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/NIVWorkload/FY2020NIVWorkloadbyVisaCategory.pdf>

We would respectfully ask that the State Department then simply disaggregate the “refused” data contained within this document so that it can provide, and make publicly available, **by post and nationality**, the total number of F-1 student visas that were counted as “refused.”

As you can see in the linked document below, the State Department already disaggregates the number of F-1 student visas “issued” by post and nationality, but does not similarly disaggregate the number of “refused” F-1 student visas by post and nationality.

<https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/MonthlyNIVIssuances/FEBRUARY%202021%20-%20NIV%20Issuances%20by%20Nationality%20and%20Visa%20Class.pdf>

<https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/MonthlyNIVIssuances/FEBRUARY%202021%20-%20NIV%20Issuances%20by%20Post%20and%20Visa%20Class.pdf>

We seek these “refusal” statistics for **F-1 student visas** for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date). Again, we simply seek data that disaggregates the numbers already contained and publicly reported in the “refused” column so that those numbers can be understood by post and nationality.

If an example is needed, please see the State Department’s response to the exact same FOIA request made last year. All that is needed are these same numbers for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date)

## **II. Compelling Need Justifying Expeditious Handling**

Substantial economic concerns of colleges and universities in the United States are implicated by the failure to process this FOIA request immediately. Universities across the United States require this information quickly so that they may better understand the changing landscape of the international student visa adjudication process and to make extremely important decisions about which international students to invest-in and recruit from around the world. This data is critical to preventing schools from wasting hundreds of millions of dollars in time and resources to recruit students from areas where they are statistically less likely to obtain visas.

## **III. Payment of Fees**

Undersigned counsel consents to, and is prepared to pay, all fees that are necessary to obtain any and all documents responsive to the requests above.

Please feel free to contact the undersigned at (202)469-5129 or by email at [leon.fresco@hkllaw.com](mailto:leon.fresco@hkllaw.com) should there be any questions.

State Department FOIA Request

April 8, 2021

Page 3

Sincerely,

A handwritten signature in cursive script that reads "Leon Fresco". The signature is written in dark ink and is positioned above the printed name.

Leon Fresco

Enclosures

# **EXHIBIT C**

**From:** [FOIA Status](#)  
**To:** [Fresco, Leon \(WAS - X75129\)](#)  
**Cc:** [FOIA Status](#)  
**Subject:** RE: Duplicative Submission - F-2020-02342  
**Date:** Tuesday, April 13, 2021 2:23:52 PM

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*[External email]*

Mr. Fresco,

This is in response to your email below regarding the status of FOIA Case Control Number F-2020-02342.

This request is in process and has a July 30, 2021, estimated date of completion (EDC). EDCs are estimates and are subject to change. Please be advised that the Department takes its FOIA responsibilities seriously and is processing this request as quickly as possible. If the request can be completed prior to the EDC, a response will be sent sooner.

If you have any concerns or questions regarding a FOIA-related matter, please contact the FOIA Requester Service Center at 202-261-8484 or send an e-mail to [foiastatus@state.gov](mailto:foiastatus@state.gov).

Regards,

U.S. Department of State  
FOIA Requester Service Center

---

**From:** Leon.Fresco@hklaw.com <Leon.Fresco@hklaw.com>  
**Sent:** Thursday, April 8, 2021 2:26 PM  
**To:** FOIArequest <FOIArequest@state.gov>  
**Cc:** FOIA Status <FOIAStatus@state.gov>  
**Subject:** RE: Duplicative Submission - F-2020-02342

Many thanks, and I appreciate the updating of the dates. It would be helpful to know the estimate date of completion of this request as it previously stood, and whether asking for an additional year (which should just be something the same database pulls up) would increase the time frame.

Many thanks,  
Leon

---

**From:** FOIArequest <[FOIArequest@state.gov](mailto:FOIArequest@state.gov)>  
**Sent:** Thursday, April 08, 2021 1:01 PM  
**To:** Fresco, Leon (WAS - X75129) <[Leon.Fresco@hklaw.com](mailto:Leon.Fresco@hklaw.com)>  
**Cc:** FOIArequest <[FOIArequest@state.gov](mailto:FOIArequest@state.gov)>  
**Subject:** Duplicative Submission - F-2020-02342

*[External email]*

Mr. Fresco,

We are in receipt of your faxed FOIA request dated April 8, 2021, seeking "F-1 Nonimmigrant Visa

Refusal Statistics by Post and Nationality for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date).” Please be advised this request is duplicative of a previous request you submitted on December 17, 2019, currently being processed under FOIA case number F-2020-02342. Attached are copies of both requests for comparison.

Our office will be aggregating your April 8<sup>th</sup> submission to F-2020-02342. We will also update F-2020-02342 to include FY 2021 (year-to-date). Should you have any questions regarding your request, would like to narrow the scope or arrange an alternative time frame to speed its processing, or would like an estimated date of completion, please contact our FOIA Requester Service Center or our FOIA Public Liaison by email at [FOIAstatus@state.gov](mailto:FOIAstatus@state.gov) or telephone at 202-261-8484.

Sincerely,

Requester Communications Branch  
Office of Information Programs and Services

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NOTE: This e-mail is from a law firm, Holland & Knight LLP (“H&K”), and is intended solely for the use of the individual(s) to whom it is addressed. If you believe you received this e-mail in error, please notify the sender immediately, delete the e-mail from your computer and do not copy or disclose it to anyone else. If you are not an existing client of H&K, do not construe anything in this e-mail to make you a client unless it contains a specific statement to that effect and do not disclose anything to H&K in reply that you expect it to hold in confidence. If you properly received this e-mail as a client, co-counsel or retained expert of H&K, you should maintain its contents in confidence in order to preserve the attorney-client or work product privilege that may be available to protect confidentiality.



## **EXHIBIT D**

# Holland & Knight

800 17th Street, NW, Suite 1100 | Washington, DC 20006 | T 202.955.3000 | F 202.955.5564  
Holland & Knight LLP | www.hklaw.com

Leon Fresco  
202 469 5129  
leon.fresco@hklaw.com

April 14, 2021

## **VIA FEDEX and FAX**

Director  
Office of Information Programs and Services  
U. S. Department of State  
State Annex 2 (SA-2)  
515 22<sup>nd</sup> Street, NW,  
Washington, DC 20522-8100  
FAX: (202) 261-8571

**Re: Appeal of Freedom of Information Act – Request for *EXPEDITIOUS HANDLING*  
**Request of F-1 Nonimmigrant Visa Refusal Statistics by Post and Nationality for FY 2019,  
FY 2020, and Fiscal Year 2021 to date****

Dear Sir or Madam:

On behalf of my client, Shorelight Education, a leading education company focused on providing educational experiences for international students, we are respectfully filing an appeal of denial of expedited processing of a Freedom of Information Act request (dated December 17, 2019 and April 8, 2021) seeking public information that is possessed by the State Department, but is not specifically provided to the public in the State Department's non-immigrant visa statistics. No decision was ever sent to us but we have now received an email from the State Department FOIA Requester Service Center definitively proving that this case is not on an expedited handling timeframe. That email is attached to this package at the conclusion of this letter. The underlying FOIA requests are also attached.

Therefore, we seek a written decision as required by 22 CFR § 171.13.

Specifically, we seek the following information/data:

1. Each year, the State Department publicly releases a document that is titled as: "ADJUSTED REFUSAL RATE - B-VISAS ONLY BY NATIONALITY"  
*See <https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/RefusalRates/FY17.pdf>.*

State Department FOIA Request – Administrative Appeal  
April 14, 2021  
Page 2

We seek the exact same statistics, in the exact same format, but for **F-1 student visas**. In other words, the numbers that would be provided would be for F-1 Student Visas instead of for B-visitor visas. We seek these statistics for Fiscal Year 2021 (year-to-date), FY 2020, and FY 2019.

2. Alternatively, if the data in Request Number 1 cannot be provided—and a lawful explanation is provided as to why this data cannot be provided—we respectfully ask that the State Department then refer to the annual document it publicly releases titled: “**Worldwide NIV Workload by Visa Category FY 2017.**”

See <https://travel.state.gov/content/dam/visas/Statistics/Non-Immigrant-Statistics/NIVWorkload/FY2017NIVWorkloadbyVisaCategory.pdf>.

We would respectfully ask that the State Department then simply disaggregate the “refused” data contained within this document so that it can provide, and make publicly available, **by post and nationality**, the total number of F-1 student visas that were counted as “refused.” As you can see in the linked document below, the State Department already disaggregates the number of F-1 student visas “issued” by post and nationality, but does not similarly disaggregate the number of “refused” F-1 student visas by post and nationality.

<https://travel.state.gov/content/travel/en/legal/visa-law0/visa-statistics/nonimmigrant-visa-statistics/monthly-nonimmigrant-visa-issuances.html>

We seek these “refusal” statistics for **F-1 student visas** for Fiscal Year 2021 (year-to-date), FY 2020, and FY 2019. Again, we simply seek data that disaggregates the numbers already contained and publicly reported in the “refused” column so that those numbers can be understood by post and nationality.

If an example is needed, please see the State Department’s response to the exact same FOIA request made last year. All that is needed are these same numbers for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date)

## II. Compelling Need Justifying Expeditious Handling

There are four compelling reasons justifying expeditious processing of this request:

- First – As Shorelight Education attempts to educate U.S. universities and members of Congress about the importance of the student visa system, Congressional members and staff consistently ask about whether the denial rate for student visas is increasing or decreasing. As this information is not currently publicly available, it is impossible to answer these questions.
- Second – Members of the media have inquired with Shorelight Education as to whether the denial rate for student visas is increasing or decreasing. As this information is not currently publicly available, it is impossible to answer these questions.
- Third - Substantial pedagogical and economic concerns of colleges and universities in the United States are implicated by the failure to process this FOIA request immediately. Universities across the United States require this information quickly so that they may better

State Department FOIA Request – Administrative Appeal

April 14, 2021

Page 3

understand the changing landscape of the international student visa adjudication process and to make multi-million dollar decisions about which international students to invest-in and recruit from around the world. This data is critical to preventing schools from wasting millions of dollars to recruit students from areas where they are statistically less likely to obtain visas.

- Fourth – This information is clearly and readily available to the State Department and is very easy to obtain and disseminate. The State Department already publishes how many F-1 visas it refuses each year, and it also publishes how many F-1 visas it is issuing monthly by post and nationality. We simply seek data that disaggregates the numbers already contained and publicly reported in the “refused” column so that those numbers can be understood by post and nationality. In fact, if an example is needed, please see the State Department’s response to the exact same FOIA request made in 2018. All that is needed are these same numbers for Fiscal Year 2019, Fiscal Year 2020, and Fiscal Year 2021 (year-to-date)

#### IV. Payment of Fees

Undersigned counsel consents to, and is prepared to pay, all fees that are necessary to obtain any and all documents responsive to the requests above.

Please feel free to contact the undersigned at (202)469-5129 or by email at [leon.fresco@hklaw.com](mailto:leon.fresco@hklaw.com) should there be any questions.

Sincerely,



Leon Fresco

Enclosures

# **EXHIBIT E**



United States Department of State

Washington, D.C. 20520

April 15, 2021

FOIA Case Number F-2020-02342

Leon Fresco  
Holland and Knight  
800 17th Street N.W., Suite 1100  
Washington, DC 20006

Dear Mr. Fresco:

This is in response to your Freedom of Information Act (FOIA) request, dated December 17, 2019, for “F-1 Nonimmigrant Visa Refusal Statistics by Post and Nationality for FY 2019, FY 2020, and Fiscal Year 2021 to date.” Specifically, this letter addresses your appeal dated April 14, 2021, of the Department of State’s denial of expedited processing.

We have considered your appeal of the denial of expedited processing. Our published regulations regarding expedition, 22 C.F.R. 171.11(f), require a specific showing of a compelling need. Expedited processing is granted only in the following situations:

- (1) Imminent threat to the life or physical safety of an individual;
- (2) Urgently needed by an individual primarily engaged in disseminating information in order to inform the public concerning actual or alleged Federal Government activity; or
- (3) Impair substantial due process rights or harm substantial humanitarian interests.

Your request and appeal do not meet the established criteria. Regrettably, I must advise that you have not provided adequate justification for expedition and I must uphold the decision to deny expedited processing. Please be assured that the Department takes its FOIA responsibilities very seriously and we are processing this request in as timely a manner as possible. All appropriate offices have been advised of your interest in this matter. **The estimated date of completion is July 2021.**

In 2007, the Office of Government Information Services (OGIS) was created to offer mediation services to resolve disputes between FOIA requesters and Federal agencies as a non-exclusive alternative to litigation. Using OGIS services does not affect your right to pursue litigation. You may contact OGIS at [ogia@nara.gov](mailto:ogia@nara.gov), or by telephone at 202-741-5770 or toll free at 1-877-684-6448, or by facsimile at 202-741-5769, or by mail at: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, MD 20740-6001.

This represents the Department's final determination on expedited processing and exhausts all administrative remedies available to you. As you may know, you have the right to seek judicial review of this determination under 5 U.S.C. Section 552 (a)(4).

For further communications with this office, please contact [FOIAStatus@state.gov](mailto:FOIAStatus@state.gov) and include the case number F-2020-02342.

Sincerely,

A handwritten signature in black ink that reads "Jeanne Miller". The signature is written in a cursive, flowing style.

Jeanne Miller, Chief  
Programs and Policies Division  
Office of Information Programs and Services