## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

	) )
Plaintiff,	) )
<b>v.</b>	) Case No
MARCO RUBIO, et al.,	) Judge
Defendants.	)
Determants.	

## **NOTICE OF SUPPLEMENTAL FACTS**

Pursuant to this Court's order from the bench of June 26, 2025, Plaintiff, by and through her undersigned counsel, respectfully submit this Notice of Supplemental Facts. Plaintiff's counsel received this response to his Freedom of Information Act ("FOIA") request today:

Between January 1, 2020 and January 1, 2025, the U.S. Department of State, through its U.S. Embassies and U.S. Consulates approved visas at the following rates after issuance of a "notice of 221(g) refusal" (for applications adjudicated by January 1, 2025):

- 1. Non-immigrant visas 71.2%
- 2. Immigrant visas 78.3%

Case

See Exhibit A, FOIA Response, August 22, 2025.

Undersigned counsel forwarded a copy of this Notice, and of the attached FOIA response, to Assistant U.S. Attorney today, in advance of filing this Notice with the Court.

August 22, 2025

/s/Anthony Drago, Jr. (with permission)

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Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I certify that I caused a copy of the foregoing Notice of Supplemental Facts to be served on all counsel of record via ECF.

/s/Brian Scott Green
BRIAN SCOTT GREEN