

July 9, 2025

U.S. Department of Justice
FOIA/PA Mail Referral Unit
Department of Justice
Room 115
LOC Building
Washington, DC 20530-0001
MRUFOIA.Requests@usdoj.gov

Federal Bureau of Investigation
Attn: Initial Processing Operations Unit
Record/Information Dissemination Section
200 Constitution Drive
Winchester, VA 22602

U.S. Department of Homeland Security
Chief Privacy Officer/Chief FOIA Officer
The Privacy Office
245 Murray Lane SW
STOP-0655
Washington, D.C. 20528-0655

U.S. Immigration and Customs Enforcement
Freedom of Information Act Office
500 12th Street SW, Stop 5009
Washington, D.C. 20536-5009

U.S. Department of State
Office of Information Programs and Services
A/GIS/IPS/RL
2201 C Street N.W., Suite B266
Washington, D.C. 20520-0000

Sent electronically via email and webforms

Re: Freedom of Information Act Request

To the Freedom of Information Officer:

This is a request under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”) by the Center for Constitutional Rights (“CCR” or “Requester”) for any and all records regarding Tawfic Abdel Jabbar, a Palestinian American citizen who was killed by Israeli fire in the occupied West Bank on January 19, 2024.

The request is directed to all appropriate subcomponents, offices, and other custodians within each agency, including but not limited to:

(1) the U.S. Department of Homeland Security (“DHS”), including Immigration and Customs Enforcement (“ICE”) and Homeland Security Investigations (“HSI”);

(2) the U.S. Department of Justice (“DOJ”), including the Criminal Division’s Human Rights and Special Prosecutions Section (“HRSP”) and the Federal Bureau of Investigation’s (“FBI”) International Human Rights Unit (“IHRU”); and

(3) the U.S. Department of State (“DOS”), including the Secretary of State, the Office of the Security Coordinator, the Bureau of Democracy, Human Rights, and Labor (“DRL”), the U.S. Office of Palestinian Affairs, the U.S. Embassy in Jerusalem, the Bureau of Consular Affairs, and the Bureau of Near Eastern Affairs (“NEA”).

CCR makes this request on behalf of the father of Tawfic Abdel Jabbar, Hafeth Abdel Jabbar, who CCR represents in his efforts to seek transparency around and accountability for his son’s killing. We have included DOJ form 461 signed by Hafeth, attached as Exhibit A.

A. Background Information

1. Tawfic Abdel Jabbar & His Killing

Tawfic Abdel Jabbar was a 17-year-old American citizen born and raised in Gretna, Louisiana.¹ His family moved to the United States nearly 30 years ago, where his father and uncle opened a Louisiana chain of stores that sell sports shoes.² Tawfic’s parents, Hafeth and Mona, are Palestinian-American.

In May 2023, Tawfic moved with his family to their ancestral home in Al-Mazra’a Ash-Sharqiya in the occupied West Bank to connect with relatives and his heritage, and to improve his Arabic.³ Tawfic was a senior in high school and had planned to return to the United States for college to become an aeronautical engineer.⁴ His dream was to work at NASA.⁵

¹ Anna Betts & Katy Reckdahl, *He Loved Basketball and Wanted to Help His Family Stores. A Bullet Ended It All*, N.Y. Times (Jan. 21, 2024), <https://www.nytimes.com/2024/01/21/us/tawfic-abdel-jabbar-palestinian-american.html>.

² Gideon Levy & Alex Levac, *In This ‘Crazy Zone’ in the West Bank, They Shoot Americans Too*, Haaretz (Feb. 3, 2024), <https://www.haaretz.com/israel-news/twilight-zone/2024-02-03/ty-article-magazine/highlight/in-this-crazy-zone-in-the-west-bank-they-shoot-americans-too/0000018d-6d29-dd6e-a98d-fd2b53ee0000>.

³ Betts & Reckdahl, *supra* fn. 1.

⁴ *Id.*; Levy & Levac, *supra* fn. 2.

⁵ *Id.*

On January 19, 2024, Tawfic was driving down a dirt road close to his village in the West Bank with his friend, Mohammed Salameh.⁶ The two were searching for a place to grill and have a picnic when a barrage of bullets suddenly hit the car.⁷ According to Salameh, two bullets came in the back windshield and broke the glass.⁸ The fourth bullet hit Tawfic in the head, causing him to lose control of the car and slump onto the steering wheel as the car flipped over multiple times.⁹ At least 10 bullets struck the car, which was seen by The Associated Press after Israeli investigators examined it.¹⁰ According to witnesses, Israeli forces surrounded the car and prevented people from reaching Tawfic for about 15 minutes, after which an ambulance took him to a hospital in Ramallah.¹¹

Tawfic was pronounced dead upon arrival.¹² According to the hospital's preliminary medical report, his cause of death was a gunshot wound to the right side of his head.¹³ The bullet that killed him was still lodged in his brain.¹⁴

2. Investigations of Tawfic's Killing

The Israeli police have stated that they launched a "comprehensive investigation" into Tawfic's killing.¹⁵ The statement further described the incident as "ostensibly involving an off-duty law enforcement officer, a soldier and a civilian"¹⁶—the latter of whom was identified by witnesses as a settler.

It remains unclear whether an officer, soldier, or settler fired the bullet that struck Tawfic in the head.¹⁷ One video taken moments after the shooting shows two Israeli soldiers standing about 20 meters from Tawfic's car with their guns cocked, indicating that soldiers were in the vicinity that day.¹⁸

⁶ Louisa Loveluck & Sufian Taha, *An American teen was killed in the West Bank. His family wants answers*, Washington Post (Jan. 26, 2024), <https://www.washingtonpost.com/world/2024/01/26/tawfic-jabbar-american-palestinian-teenager/>; Julia Frankel, *US Investigators visit homes of two Palestinian-American teens killed in the West Bank*, AP (Feb. 15, 2024), <https://apnews.com/article/israel-palestinians-america-teenagers-west-bank-killing-33e35fb8e9a9a3641b32ad59b1e50379>.

⁷ Frankel, *supra* fn. 6.

⁸ Loveluck & Taha, *supra* fn. 6.

⁹ *Id.*

¹⁰ Frankel, *supra* fn. 6.

¹¹ *Israeli settler, soldier shoot dead 17-year-old Palestinian-American boy*, Defense for Children International - Palestine (Jan. 20, 2024), https://www.dci-palestine.org/israeli_settler_soldier_shoot_dead_17_year_old_palestinian_american_boy.

¹² Loveluck & Taha, *supra* fn. 6.

¹³ Frankel, *supra* fn. 6.

¹⁴ Loveluck & Taha, *supra* fn. 6.

¹⁵ Betts & Reckdahl, *supra* fn. 1.

¹⁶ Frankel, *supra* fn. 6.

¹⁷ Defense for Children International - Palestine, *supra* fn. 11.

¹⁸ Frankel, *supra* fn. 6.

The day after Tawfic was killed, an Israeli forensic team cleaned up the site and collected the evidence.¹⁹ This included the car Tawfic was driving, which investigators took into custody for nearly a week before returning it.²⁰ The Israeli authorities did a full forensic investigation and report, but never released it to Tawfic's family. The Palestinian Authority arrived later, collected two bullets that the Israeli team left behind, and issued a report. *See* Exhibit B. The report collected statements from witnesses and found that Tawfic's cause of death was a brain laceration and severe hemorrhage due to a gunshot to the right side of his head.

A few days after Tawfic's killing, a representative of the U.S. Consulate in Jerusalem, Waleed Neiroukh, visited the family to hear what happened.²¹ He was accompanied by Jeff M. Collins, a representative of the U.S. Embassy in Jerusalem. Collins introduced himself as part of the Special Investigation Unit and said he was there to investigate Tawfic's killing. Tawfic's father, Hafeth, took him to the scene, where Collins took pictures. Since then, Collins visited the site a few more times and told Hafeth they were pressuring the Israeli government to investigate. Collins and Neiroukh have also visited Hafeth at his home. Hafeth has also had meetings with the chiefs of the U.S. Office of Palestinian Affairs, George Noll (2020-2024) and Hans Wechsel (2024-2025).

We have been informed that stemming from the Israel police investigation, the police have handed the investigation file over to the Israeli prosecution, the District Attorney, Jerusalem district.

3. U.S. Government's Response

John Kirby, then-U.S. National Security Council spokesman, said White House officials were "seriously concerned" about the incident and would be "in constant touch with counterparts in the region to get more information."²² The U.S. Office of Palestinian Affairs said in a post on X that it was "devastated by the killing."²³ At a press conference, then-U.S. Secretary of State Antony Blinken offered his "deepest condolences" to the family and said that "there needs to be an investigation" and, if appropriate, "accountability."²⁴ Secretary Blinken did not reach out directly to the family.

Tawfic's father, Hafeth, has corresponded with U.S. Senator Chris Van Hollen, whose office sent a letter in July 2024 to then-Secretary Blinken asking what actions DOS had taken in ensuring a thorough and credible investigation. *See* Exhibit C. DOS

¹⁹ *Id.*

²⁰ *Id.*

²¹ Levy & Levac, *supra* fn. 2.

²² Loveluck & Taha, *supra* fn. 6.

²³ U.S. Office of Palestinian Affairs (@USPalAffairs), X (Jan. 20, 2024, 3:07 PM), <https://x.com/USPalAffairs/status/1748799469276057987>.

²⁴ Jennifer Hansler, *Blinken offers condolences on reported killings of two Americans in West Bank and calls for investigation*, CNN (Feb. 15, 2024), <https://www.cnn.com/2024/02/15/politics/blinden-americans-west-bank-investigation/index.html>.

responded that its “Diplomatic Security Service Overseas Criminal Investigations Unit in Jerusalem continues to liaise with the Department of Justice and other partners regarding requests to Israel’s Office of the State Attorney regarding the death[] of Mr. Jabbar.” See Exhibit D.

According to a U.S. official, as of February 2024, U.S. authorities were closely watching the Israeli investigations and were ready to escalate the cases with the Israeli government if the investigations fell short.²⁵ In May 2025, Hafeth contacted Waleed Neiroukh of the U.S. Consulate in Jerusalem, who responded that he had no updates on any investigation. As of the date of this request, Tawfic’s family has received no other updates from the U.S. government regarding the status of any investigation.

4. Other U.S. Citizens Killed by Israel

Tawfic is one of 908 Palestinians killed in the occupied West Bank by Israeli fire between October 7, 2023, and March 31, 2025.²⁶ Although he was the first U.S. citizen to be killed by Israeli fire in the occupied West Bank since October 7, 2023, he is not the first U.S. citizen killed by Israel in the context of Israel’s unlawful occupation. As Israel enjoys complete impunity for killing U.S. citizens, the list continues to grow. U.S. citizens killed by Israel prior to Tawfic include Rachel Corrie, who was crushed to death by an Israeli military bulldozer in occupied Gaza in 2003; Furkan Doğan, the 18-year-old who was shot five times by Israeli forces in international waters in 2010 with the final gunshot to his head at point-blank range; Mahmoud Shaalan, a 16-year-old Palestinian American killed at an Israeli checkpoint in 2016; Omar Assad, a 78-year-old Palestinian American that died while detained by Israeli forces in 2022; and Shireen Abu Akleh, a Palestinian American journalist killed by Israeli forces in Jenin in 2022. Since Tawfic was killed, Israel has killed several more U.S. citizens, including 17-year-old Mohammad Khmour, Jacob Flickinger, and Ayşenur Eygi Ezgi, all of whom were killed by Israeli forces in 2024.

B. Request for Information

CCR requests disclosure of any and all RECORDS as stated below:

1. Any RECORDS related to investigations conducted by any office, component, or division, and/or individual agent(s), of DHS, DOJ, or DOS, including the U.S. Office of Palestinian Affairs, that references or relates to Tawfic Abdel Jabbar since January 19, 2024;

²⁵ Yahya Abou-Ghazala & Alex Marquardt, *Families of killed Palestinian-Americans demand answers of US, Israel*, CNN (Feb. 15, 2024), <https://www.cnn.com/2024/02/23/world/palestinian-americans-demand-answers-invs/index.html>.

²⁶ *West Bank Monthly Snapshot - Casualties, Property Damage and Displacement | March 2024*, U.N. Office for the Coordination of Humanitarian Affairs (Apr. 30, 2025), <https://www.ochaopt.org/content/west-bank-monthly-snapshot-casualties-property-damage-and-displacement-march-2025>.

2. Any RECORDS of communication(s) between any person working for any component, office, or division of DHS, DOJ, or DOS, including the U.S. Office of Palestinian Affairs, with the Key U.S. Officials that references or relates to Tawfic Abdel Jabbar since January 19, 2024;
3. Any RECORDS of communication(s) between any person working for any component, office, or division of DHS, DOJ, or DOS, including the U.S. Office of Palestinian Affairs, with any other U.S. government agencies that references or relates to Tawfic Abdel Jabbar since January 19, 2024; and
4. Any RECORDS of communication(s) between any person working for any component, office, or division of DHS, DOJ, or DOS, including the U.S. Office of Palestinian Affairs, with any Israeli government individuals and/or offices or agencies, including but not limited to the Israeli Ministry of Foreign Affairs, the Israel Police, the Israeli Attorney General's Office, the Jerusalem District Attorney's Office, and the Israel Defense Forces, that references or relates to Tawfic Abdel Jabbar since January 19, 2024.

C. Definitions

- **Records.** In this request the term “RECORD(S)” includes, but is not limited to, all Records or communications preserved in electronic (including metadata) or written form, such as correspondences, emails, documents, data, videotapes, audio tapes, faxes, files, guidance, guidelines, evaluations, instructions, analyses, memoranda, agreements, notes, orders, policies, procedures, legal opinions, protocols, reports, rules, talking points, technical manuals, technical specifications, training manuals, studies, or any other Record of any kind. Without limitation, the records requested include records at any stage of development, whether proposed, draft, pending, interim, final, or otherwise.
- **Key U.S. Officials.** In this request the term “Key U.S. Officials” includes, but is not limited to, the following individuals and their immediate staff:
 - Waleed Neiroukh
 - Jami Alford (Current Law Enforcement, U.S. Embassy in Jerusalem)
 - Jeffrey M. Collins (Past Law Enforcement, U.S. Embassy in Jerusalem)
 - George Noll (former Head of U.S. Office of Palestinian Affairs, 2020-2024, U.S. Embassy in Jerusalem)²⁷
 - Hans Wechsel (former Head of U.S. Office of Palestinian Affairs, 2024-2025, U.S. Embassy in Jerusalem)
 - Lourdes Lamela (Head of U.S. Office of Palestinian Affairs, 2025, U.S. Embassy in Jerusalem)
 - Mike Huckabee (U.S. Ambassador to Israel)

²⁷ This request still seeks records from the Office of Palestinian Affairs, even if it has been closed or moved by the Trump Administration. *See, e.g.,* Joseph Gedeon, *US closes Office of Palestinian Affairs, dedicated channel to Washington*, Guardian (May 19, 2025), <https://www.theguardian.com/world/2025/may/19/office-of-palestinian-affairs-closed>.

- **Communications:** In this request the term “communication” means the transmittal of information (in the forms of facts, ideas, inquiries or otherwise) and includes emails, letters, texts, voicemails, Signal messages, direct messages via social media sites (Facebook, Discord, Instagram, X, and elsewhere) whether digital, paper, audio and/or video.

D. Format of Production

With respect to the form of production, *see* 5 U.S.C. § 522(a)(3)(B). Please search for responsive records regardless of format, medium, or physical characteristics, and including electronic records. Please provide the requested document in the following format:

- In PDF format;
- Bates numbered individually in order;
- Electronically searchable text wherever possible;
- “Parent-child” relationships maintained, meaning that the requestor must be able to identify the attachments with emails;
- Any data records in native format (*i.e.*, Excel spreadsheets in Excel);
- Emails should include BCC and any other hidden fields;
- With any other metadata preserved.

E. Requester

CCR is a non-profit, public interest legal and advocacy organization dedicated to advancing and protecting the rights guaranteed by the United States Constitution and international human rights law. CCR’s diverse issue areas include racial and gender justice, immigration, government and corporate accountability, and a long history of advocacy related to Palestinian rights. One of CCR’s primary activities is the publication of newsletters, know-your-rights handbooks, legal analysis of current legal issues, and other similar materials for public dissemination. These and other materials are available through CCR’s Communications, Advocacy, and Development Departments. CCR operates a website, <http://ccrjustice.org>, which addresses the issues on which the Center works. CCR staff members often serve as sources for journalists and media outlets. In addition, CCR regularly issues press releases, has an active social media presence with thousands of followers, and also issues regular email updates sent to over 50,000 supporters about developments and news pertaining to CCR’s work.

F. Request for Fee Waiver

CCR is entitled to a fee waiver pursuant to 5 U.S.C. § 552(a)(4)(A)(iii) on the grounds that “disclosure of the requested records is in the public interest because it is likely to contribute significantly to the public understanding of the activities or operations of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C. § 552(a)(4)(A)(iii). CCR meets the requirements for a fee waiver because the subject of the request concerns the operations or activities of the government, the

disclosure of the information is likely to contribute to a significant public understanding of government operations or activities, the Requesters' primary interest is in disclosure, and they have no commercial interest in the information. *See* 6 C.F.R. § 5.11(b); 22 C.F.R. § 171.16(j); 28 C.F.R. § 16.10(k).

As described above, CCR is a non-profit organization dedicated to educating the public and advocating for civil and human rights, and has undertaken this work in the public interest and not for any private commercial interest. Similarly, the primary purpose of this FOIA request is to obtain information to further the public's understanding of the U.S. government's response to an international incident in which a U.S. citizen was killed. Access to this information is crucial for CCR, and the communities we serve, to evaluate government procedures and actions in investigating and seeking accountability for the killings of U.S. citizens abroad.

CCR has no commercial interest in the requested information. Disclosure in this case, therefore, meets the statutory criteria, and a fee waiver would fulfill Congress' legislative intent in amending FOIA. *See Judicial Watch Inc. v. Rossotti*, 326 F.3d 1309, 1312 (D.C. Cir. 2003) ("Congress amended FOIA to ensure that it be 'liberally construed in favor of waivers of noncommercial requesters.'") (citing *McClellan Ecological Seepage Situation v. Carlucci*, 835 F.2d 1282, 1284 (9th Cir. 1987)).

In the alternative, if no fee waiver is granted and the fees exceed \$250.00, please contact CCR to obtain consent to incur additional fees. Processing fees should be limited pursuant to 5 U.S.C. § 552(a)(4)(A)(ii)(II) ("[F]ees shall be limited to reasonable standard charges for document duplication when records are not sought for commercial use and the request is made by . . . a representative of the news media.").

G. Expedited Processing

CCR is entitled to expedited processing of this request because there is a "compelling need" for the information. 5 U.S.C. § 552(a)(6)(E)(i)(I). A "compelling need" is established when there exists an "urgency to inform the public about an actual or alleged Federal Government activity," when the requester is a "person primarily engaged in disseminating information." *See* 6 C.F.R. § 5.5(d)(ii); 22 CFR § 171.11(f); 28 C.F.R. § 16.5(e)(ii).

As described in Part E above, CCR is significantly engaged in disseminating information and community advocacy in support of fundamental civil rights and the rule of law, and has a proven track-record of compiling and disseminating information and reports to the public about government functions and activities. Furthermore, CCR will also disseminate any records released to its broad membership base for no cost as well.

In addition, the agencies grant expedited processing where the subject of the request is a "matter of widespread and exceptional media interest in which there exist possible questions about the government's integrity that affect public confidence." 28 C.F.R. § 16.5(e)(iv). There is an urgent need to inform the public of policies, procedures,

requests, demands, or any other responses, actions or inactions, the United States has made to ensure the killing of a U.S. citizen abroad is adequately and independently investigated, and that such an investigation yields accountability. Moreover, given reports of increasing and intensifying violence in the occupied West Bank,²⁸ including by settlers against U.S. citizens, this matter is urgent. The more information we have, and the sooner we obtain it, the more fully the public can begin to understand how the U.S. government responds to extrajudicial killings of U.S. citizens abroad.

H. Response

CCR expects a determination of this request by each agency for records within 20 days, as provided by statute. *See* 5 U.S.C. § 552(a)(6)(A)(i).

If our request is denied, in whole or in part, we ask that each agency justify all deletions by reference to specific exemptions to FOIA. We also expect each agency to release all segregable portions of otherwise exempt material. CCR reserves the right to appeal each agency's decision to withhold any information.

Thank you for your prompt attention to this matter. Please furnish all applicable records to: **Ian Head, Center for Constitutional Rights, at ihead@ccrjustice.org (preferred)** or by mail to Ian Head, Center for Constitutional Rights, 666 Broadway, 7th Floor, New York, NY 10012; (212) 614-6470.

I certify that the above information is true and correct to the best of my knowledge.



Ian Head
Open Records Manager
Center for Constitutional Rights
ihead@ccrjustice.org (preferred)
212-614-6470

²⁸ *Data Sheet: Law Enforcement on Israeli Civilians in the West Bank (Settler Violence)*, 2005–2024, Yesh Din (Jan. 16, 2025), <https://www.yesh-din.org/en/data-sheet-law-enforcement-on-israeli-civilians-in-the-west-bank-settler-violence-2005-2024/>; *UN rights office raises alarm over escalating violence in occupied West Bank*, UN News (Jan. 24, 2025), <https://news.un.org/en/story/2025/01/1159411>.