UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SIKH COALITION, *Plaintiff,* v. UNITED STATES DEPARTMENT OF TRANSPORTATION, *Defendant.*	Civil Action No.: 26-cv-10074 **COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

1. Plaintiff Sikh Coalition (hereinafter "Sikh Coalition" or "Plaintiff") brings this action under the Freedom of Information Act (FOIA), 5 U.S.C. §§ 552 *et seq.*, to compel the release of agency records improperly withheld by Defendant, U.S. Department of Transportation ("DOT") as well as offices, components and/or individual custodians within DOT that hold responsive records to Plaintiffs' FOIA request.

2. On July 30, 2026, Plaintiff submitted a FOIA request to DOT which sought records relating to Defendant's involvement in "Operation ICE Wall," a law enforcement program primarily run by the U.S. Immigration and Customs Enforcement agency ("ICE"). *See* Exhibit 1, Plaintiff's FOIA Request.

3. A significant part of Plaintiff's work is the dissemination of information relevant to the U.S.-based Sikh community, including Sikh truck drivers and Sikh immigrants. Among Plaintiff's informational resources are 'know your rights' (KYR) materials for Sikh truck drivers and KYR resources on immigration and ICE. Approximately, 150,000 Sikhs work in the trucking industry, 90 percent of whom are drivers.[1] Amongst Sikh truck drivers, there is concern that

[1] *See An all-American industry changes the all-American way*, The Economist (May 3, 2018), https://www.economist.com/united-states/2018/05/03/an-all-american-industry-changes-the-all-american-way.

Operation ICE Wall is unnecessarily creating barriers for qualified individuals and targeting truck drivers of South Asian or Sikh descent.

4. Defendant DOT and its sub-component offices have unjustifiably failed to produce information or make any determination on the records requested by Plaintiff within the statutory timeframe. To vindicate the public's statutory right to information about Operation ICE Wall, Plaintiff seeks declaratory, injunctive, and other appropriate relief to compel the agency to immediately respond to Plaintiff's Requests and release records that they have unlawfully withheld.

JURISDICTION AND VENUE

5. This Court has both subject matter jurisdiction over this action and personal jurisdiction over the parties pursuant to 5 U.S.C. §§ 552(a)(4)(B) and 552(a)(6)(C)(i). This Court also has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1346(a)(2).

6. Venue lies in this district pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. §§ 1391(e) and 1402(a), as Plaintiff Sikh Coalition resides in this district.

PARTIES

7. Plaintiff Sikh Coalition is a 501(c)(3) non-profit and nonpartisan organization dedicated to ensuring that members of the Sikh community in the United States are able to practice their faith without fear of discrimination or backlash. Sikh Coalition defends the civil rights and civil liberties of Sikhs by providing direct legal services, advocating for policy change, educating the public about Sikhs and Sikhi, and fostering civic engagement amongst Sikh Americans.

8. DOT is an "agency" within the meaning of 5 U.S.C. § 552(f)(1). DOT and its offices have possession, custody, and control of the records that Plaintiff seeks.

STATEMENT OF FACTS

I. Background

9. On April 28, 2025, President Trump issued Executive Order 14286 "Enforcing Commonsense Rules of the Road for America's Truck Drivers," which ordered the Secretary of Transportation to review "non-domiciled commercial driver's licenses issued by relevant State agencies to identify any unusual patterns . . . or other irregularities." 90 Fed. Reg. 18759 (April 28, 2025).

10. Then, in August 2025, following a crash involving Harjinder Singh, a Sikh, non-domiciled Commercial Driver's License ("CDL") holder, the U.S. Department of Homeland Security (DHS) posted that it would "work with DOT to root out and prevent illegal aliens from obtaining these licenses from sanctuary jurisdictions that put American drivers and passengers in danger."[2]

11. Non-domiciled CDLs are given to individuals with temporary nonimmigrant status, and individuals who are otherwise lawfully entitled to work in the United States while in the process of securing permanent lawful immigration status.

12. On September 29, 2025, the Federal Motor Carrier Safety Administration, a component of Defendant DOT, issued an Interim Final Rule that would strip approximately 200,000 drivers of their non-domiciled CDLs based on their immigration status. On November 13, 2025, the D.C. Circuit Court of Appeals issued an administrative stay of the Interim Final Rule. *See Rivera Lujan v. Federal Motor Carrier Safety Administration*, No. 25-1215, 2025 WL 3182504, at *1 (D.C. Cir. Nov. 13, 2025). This led FMSCA to issue a Final Rule on March 16,

[2] DHS (@DHSgov), X (Aug. 20, 2025, at 6:20 AM), https://x.com/DHSgov/status/1958157078503030915. DHS then doubled down and used Singh's name and likeness on X (formerly Twitter) to villainize Sikh truck drivers. DHS (@DHSgov), X (Oct. 8, 2025, at 12:00 PM), https://x.com/dhsgov/status/1976007319197712471?s=46&t=TtB-NjfkmOcriEtub1XBQQ.

2026, which is currently in effect and targets the same population of non-domiciled commercial drivers by preventing them from renewing, replacing, or reapplying for their CDLs.[3]

13. Around the same time that FMSCA issued the Interim Final Rule, ICE initiated Operation ICE Wall. ICE has described it as "an initiative targeting illegal aliens operating commercial vehicles throughout the United States." *Dhillon v. Mullin*, No. 8:26-CV-229, 2026 WL 1587371, at *1 (D. Neb. June 3, 2026) (quoting declaration of ICE Senior Supervising Deportation Officer Quintin Erdman).[4]

14. Operation ICE Wall is a program run collaboratively by DOT, DHS, ICE, and local law enforcement that targets non-citizens operating commercial vehicles.

15. Operation ICE Wall is a project of the Trump Administration's Joint Task Force, Crossroads of America. According to the Administration:

> This unprecedented interagency campaign represents the Trump Administration's most aggressive effort in history to root out fraud, waste, and abuse in trucking. By aligning USDOT's regulatory authorities with federal law enforcement operations, the administration is taking aggressive action to safeguard American roads against unqualified and unvetted illegal truckers.[5]

16. Through Operation ICE Wall, immigrant truck drivers have been unlawfully stopped and detained by ICE.[6] In addition, operations run by the federal government, including Operation ICE Wall, are having a significant economic impact on the trucking and transportation

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[3] Restoring Integrity to the Issuance of Non-Domiciled Commercial Drivers Licenses (CDL), 91 Fed. Reg. 7044 (Feb. 13, 2026) (to be codified at 49 C.F.R. Parts 383 and 384).

[4] *See also* Press Release, U.S. Immigr. & Customs Enf., *ICE arrests 650 illegal aliens in West Virginia* (Jan. 30, 2026), https://www.ice.gov/news/releases/ice-arrests-650-illegal-aliens-west-virginia (describing coordinated federal, state and local law enforcement efforts targeting "aliens operating commercial vehicles.").

[5] Press Release, U.S. Dep't of Transportation, *U.S. Transportation Secretary Duffy, U.S. Homeland Security Secretary Mullin, White House Fraud Task Force, & Top U.S. Attorneys Launch Historic Interagency Effort to Crack Down on Fraud in Trucking Industry* (Aug. 31, 2026), https://www.transportation.gov/briefing-room/us-transportation-secretary-duffy-us-homeland-security-secretary-mullin-white-house.

[6] *See, e.g.*, Morgan Watkins, *Indiana State Police help drive Trump's crackdown on immigrant truckers*, records show, Louisville Public Media (Oct. 13, 2026), https://www.lpm.org/investigate/2026-10-13/indiana-state-police-help-drive-trumps-crackdown-on-immigrant-truckers-records-show; FOX 9 Minneapolis-St. Paul, *Trucker arrested during Iowa Operation ICE Wall immigration enforcement*, YouTube (Apr. 15, 2026), https://www.youtube.com/watch?v=AIOQudQNHLs.

industry.[7] For Operation ICE Wall to function, it relies on cooperation between law enforcement and 287(g) agreements that delegate state and local law enforcement officers the authority to perform specified immigration officer functions under ICE's direction and oversight.[8]

17. ICE provides training to 287(g) "certified Troopers," and those officers receive limited authority to enforce immigration laws. State law enforcement or transportation officers are given authority to question individuals' immigration status, make arrests at the direction of ICE, and serve warrants.

18. There have been a significant number of truck driver stops across the country. For example, in Iowa, Operation ICE Wall partnered ICE with the Commercial Motor Vehicle Unit of the Iowa State Patrol ("ISP") Troopers, which is funded in part by the Defendant DOT, at weigh-stations throughout the state. In several cases, ISP Troopers have stopped truck drivers at weigh stations or nearby on the interstate and held noncitizens while they contact ICE, who later arrived and arrested the noncitizens. Many of those individuals successfully challenged their detention through federal habeas petitions. *See, e.g.*, *Dhillon v. Mullin*, No. 8:26-CV-229, 2026 WL 1587371, at *1 (D. Neb. June 3, 2026); *Sandhu v. Mullin*, No. 7:26-cv-5009, 2026 WL 1146643, at *3-5 (D. Neb. Apr. 28, 2026); *Abhishek v. Sommer*, No. 8:26-cv-166, 2026 WL 1168105, at *1 (D. Neb. Apr. 29, 2026); *Saini v. Schneider*, No. 4:26-cv-00112-RGE-SBJ (S.D. Iowa Apr. 6, 2026), ECF No. 12; *Vasal v. Noem*, No. 4:26-cv-00066-SHL-WPK (S.D. Iowa Apr. 20, 2026), ECF No. 31; *Singh v. Mullin*, No. 4:26-cv-00142-SHL-HCA (S.D. Iowa Apr. 20, 2026), ECF No. 8; *Singh v. Mullin*, No. 1:26-cv-00056, 2026 WL 1021846, at *1 (N.D. Iowa Apr. 15, 2026); *Abbas*

[7] *See* Lauren Gilger, *The Trump administration's immigration crackdown is hitting immigrant truck drivers*, KJZZ (Aug. 24, 2026), https://www.kjzz.org/the-show/2026-08-24/the-trump-administrations-immigration-crackdown-is-hitting-immigrant-truck-drivers.

[8] *See* Press Release, U.S. Immigr. & Customs Enf., *ICE arrests 650 illegal aliens in West Virginia* (Jan. 30, 2026), https://www.ice.gov/news/releases/ice-arrests-650-illegal-aliens-west-virginia (describing coordinated federal, state and local law enforcement efforts targeting "aliens operating commercial vehicles.").

v. Schneider, No. 4:26-CV-00132, 2026 WL 1079292, at *2 (S.D. Iowa Apr. 17, 2026); *Ermekov v. Mullin*, No. C26-41-LTS-KEM, 2026 WL 1046766, at *1 (N.D. Iowa Apr. 17, 2026); *Valero-Cabeza v. Immigr. & Customs Enf't*, No. C25-217-LTS-MAR, 2026 WL 296218, at *1 (N.D. Iowa Feb. 4, 2026); *Singh v. Noem*, No. C26-12-LTS-MAR, 2026 WL 369922, at *1 (N.D. Iowa Feb. 10, 2026); *Singh v. McDaniel*, No. C26-0003-LTS, 2026 WL 369757, at *1 (N.D. Iowa Feb. 10, 2026), *reconsideration denied,* No. C26-0003-LTS, 2026 WL 595454 (N.D. Iowa Mar. 3, 2026). Within these 13 cases on behalf of truck drivers detained in Iowa, 11 cases are drivers of South Asian descent, with a majority likely also Sikh.[9]

19. On September 9, 2026, DHS posted content (copied below) on social media platform X depicting a Punjabi-Sikh man in front of a Transformers figure with the statement "Get off our roads, you don't know how to drive Mr. Singh." It also stated in smaller print: "self-deport or find out" and "America for Americans." This post immediately caused the Sikh trucking community distress.



[9] Common Sikh surnames include Singh, Dhillon, Saini, and Sandhu. *See Sikh*, FamilyTreeDNA, https://www.familytreedna.com/groups/sikh/surnames.

20. Since September 11, 2001, Sikhs have been targeted and profiled for their articles of faith, which include head coverings, and this content from DHS was of extreme concern to the millions of Sikhs in the United States, particularly to those who have the last name Singh and to those in the trucking industry.

II. Compelling Necessity for Records Sought

21. In the months since the filing of Plaintiff's FOIA request, the need for information regarding Operation ICE Wall and Defendant DOT's involvement remains high.

22. On September 16, 2026, ICE announced arrests at New Jersey and New Hampshire commercial-vehicle inspection stations.[10] On November 3, 2026, an Operation ICE Wall adjacent stop occurred in Oklahoma targeting more commercial truck drivers.[11]

23. The details of Operation ICE Wall are of great concern to immigrant communities, their families and advocates across the country, as well as the general public.

24. Although Operation ICE Wall has been concentrated in states with 287(g) agreements, the lack of information regarding whether this operation is only concentrated in states and municipalities with 287(g) agreements or is expanding to other states and municipalities and how DOT is involved has caused widespread concern amongst truck drivers.

III. Plaintiff's Request for Information

21. On July 30, 2026, Plaintiffs submitted their FOIA request to Defendant DOT via email.

22. The request sought:

> (1) Any and all directives, protocols, policies, guidance, internal trainings, manuals, assignments or memorandums of understanding between Department of

[10] Phil Brink, *ICE targets truck drivers at travel stops and inspection checkpoints*, Freight Waves (Sept. 16, 2026), https://www.freightwaves.com/news/ice-targets-truck-drivers-at-travel-stops-and-inspection-checkpoints.
[11] Leonel Ramos, *Federal, Oklahoma law enforcement tout recent multi-state immigration sting*, KGOU (Nov. 3, 2026), https://www.kgou.org/politics-and-government/2026-11-03/federal-oklahoma-law-enforcement-tout-recent-multi-state-immigration-sting.

> Transportation (DOT) and ICE that mention: "Operation ICE Wall" or other immigration enforcement efforts directed at commercial driver's license holders. (2) Any and all directives, protocol, policy, guidance, internal trainings, manuals, assignments or memorandums of understanding created by DOT that mention: "Operation ICE Wall" or other immigration enforcement efforts directed at commercial driver's license holders. (3) Any and all contracts, agreements, descriptions of partnerships or obligations between DOT and ICE that describe ICE's mission at interstate weigh stations as reported on July 1st by USA Today. (4) Any and all graphs, charts, statistics, symbols, maps, or demographics that were created by DOT and shared with ICE relating to non-domiciled commercial driver's license holders and commercial driver's license holders. (5) Any and all graphs, charts, statistics, symbols, maps, or demographics created by DOT that were distributed or shared with ICE identifying weight station stops throughout the United States.

23. On July 30, 2026, DOT emailed an acknowledgment letter to Plaintiff which assigned Plaintiff's FOIA request the tracking number #OST-2026-0666 and did not address Plaintiff's requests for either expedited processing or fee waiver.

24. On September 2, 2026, Plaintiff emailed Defendant DOT requesting an update on Plaintiff's FOIA request, and also notifying Defendant that it had not made a determination within the statutory timeframe mandated under FOIA.

25. To date, Plaintiff has received no other response from Defendant DOT to their FOIA request.

26. Plaintiff's Request sought expedited processing under 5 U.S.C. § 552(a)(6)(E)(i)(I), citing a "compelling need" for the information because of the urgent need to inform the public of ICE's ongoing presence at state run weigh stations and at highway inspections conducted by DOT, to carry out its immigration sweeps targeting immigrant commercial vehicle drivers, causing widespread confusion among truck drivers and truck company owners.

27. Plaintiff's Request also sought a waiver of applicable fees under 5 U.S.C. § 552(a)(4)(A)(iii); 49 CFR § 7.43, because "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." The Sikh Coalition is a non-profit entity with no commercial interest in the records requested, which are crucial to public understanding of Defendant's operations. Defendant has not responded to Plaintiff's request for a fee waiver.

CLAIMS FOR RELIEF

First Claim for Relief:

Violation of FOIA for Failure to Disclose and Release Responsive Records

28. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 27 as if repeated and incorporated herein.

29. By failing to make a determination on Plaintiff's FOIA request within the mandated statutory timeframe, by failing to disclose and release the requested records, and by failing to conduct an adequate search reasonably calculated to uncover responsive records, Defendant has violated the public's right, advanced by the Plaintiff, to agency records under 5 U.S.C. §§ 552 *et seq*.

Second Claim for Relief:

Violation of FOIA for Improper Denial of Plaintiff's Request for Expedited Processing

30. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 27 as if repeated and incorporated herein.

31. By denying or failing to respond timely to Plaintiff's request for expedited processing, Defendant has violated Plaintiff's rights under 5 U.S.C. § 552(a)(6)(E) and Defendant's own regulations.

Third Claim for Relief:

Violation of FOIA for Improper Denial of Plaintiffs' Request for Fee Waiver

32. Plaintiffs repeat and re-allege each and every allegation contained in paragraphs 1 through 27 as if repeated and incorporated herein.

33. By failing to respond or failing to non-conditionally grant Plaintiff's requests for fee waivers, Defendant has denied Plaintiff's rights under 5 U.S.C. § 552(a)(4)(A)(iii) and Defendant's own regulations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

(a) Order Defendant immediately to make a full, adequate, and expedited search for the requested records;

(b) Order Defendant to engage in expedited processing in this action;

(c) Enjoin Defendant from assessing fees or costs for the processing of the FOIA Requests;

(d) Order Defendant to disclose the requested records in their entirety and make copies available to Plaintiffs no later than ten days after the Court's order;

(e) Award Plaintiff their costs and reasonable attorney's fees incurred in this action as provided by 5 U.S.C. § 552(a)(4)(E); and

(f) Grant each other and further relief as this Court may deem just and proper.

Dated: November 17, 2026
New York, NY

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***Pro hac vice motion forthcoming*
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