

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Ahmed Mohafel, et al. v. Marco Rubio, United States Secretary of
State, et al.

Mohafel · No. 25-cv-11061 · Decided November 25, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan granted the government’s motion to dismiss an action seeking mandamus and Administrative Procedure Act relief concerning a refused immigrant visa application. The court held that the plaintiffs failed to establish Article III standing because they identified no legal duty requiring further adjudication or reconsideration of the refused visa application and therefore lacked a redressable injury.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Robert J. White
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	November 25, 2025
DOCKET	25-cv-11061
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiffs brought an action for mandamus and under the Administrative Procedure Act seeking to compel federal officials to direct further adjudication of a refused immigrant visa application. The government moved to dismiss under Federal Rule of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction, including lack of Article III standing.
STANDARD OF REVIEW	On a facial Rule 12(b)(1) challenge, the court accepts the complaint's allegations as true and construes them in the light most favorable to the nonmoving party. The plaintiff bears the burden of establishing Article III standing.
PRECEDENTIAL VALUE	unpublished
PARTIES	Ahmed Mohafel, Nourhan Galabi v. Marco Rubio, United States Secretary of State, Other federal officials

TOPICS

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QUESTIONS PRESENTED

1. Whether plaintiffs had Article III standing to seek mandamus or Administrative Procedure Act relief compelling further adjudication of an immigrant visa application that a consular officer had already refused.
2. Whether the complaint plausibly alleged a concrete, particularized, and redressable injury-in-fact.
3. Whether the court could dismiss the mandamus and APA claims for lack of subject matter jurisdiction under Federal Rule of Civil Procedure 12(b)(1).

HOLDINGS

1. Plaintiffs lacked Article III standing because the complaint did not plausibly allege a concrete and particularized injury that was redressable through a favorable judicial decision.
2. The Administrative Procedure Act does not itself confer subject matter jurisdiction on federal courts.

KEY QUOTATIONS

“Without plausible allegations of a concrete and particularized injury that is redressable, Mohafel and Galabi have “no standing to sue and thus no basis for moving forward with” their substantive claims.” (IV.B)

FACTUAL BACKGROUND

Mohafel is a United States citizen who filed a Form I-130 petition for his mother, Nourhan Galabi, a displaced Syrian national residing in Malaysia. Galabi attended a consular interview at the United States Embassy in Kuala Lumpur on August 27, 2024, after which a consular officer refused her immigrant visa application under 8 U.S.C. § 1201(g). Plaintiffs sought to compel the Secretary of State and other federal officials to require further adjudication or administrative processing of the refused application.

PROCEDURAL HISTORY

Ahmed Mohafel, a United States citizen, and his mother, Nourhan Galabi, filed suit after a consular officer at the United States Embassy in Kuala Lumpur refused Galabi's immigrant visa application following an interview. Plaintiffs sought an order compelling further adjudication or administrative processing. The district court granted the government's motion to dismiss because plaintiffs failed to establish a concrete, particularized, and redressable injury.

DISPOSITION

dismissed

CASES CITED

- United States v. Ritchie, 15 F.3d 592, 598 (6th Cir. 1994)
- Lyshe v. Levy, 854 F.3d 855, 857 (6th Cir. 2017)
- Ward v. National Patient Account Services Solutions, 9 F.4th 357, 363 (6th Cir. 2021)
- Buchholz v. Tanick, 946 F.3d 855, 867 (6th Cir. 2020)
- Spokeo, Inc. v. Robins, 578 U.S. 330, 338 (2016)
- Hussein v. Beecroft, 782 F. App'x 437, 441-443 (6th Cir. 2019)
- In re National Prescription Opiate Litigation, Nos. 22-3493/3653, 2022 U.S. App. LEXIS 34312, at *19 (6th Cir. Dec. 13, 2022)
- Jama v. Department of Homeland Security, 760 F.3d 490, 494 (6th Cir. 2014)
- Lujan v. Defenders of Wildlife, 504 U.S. 555, 560-561 (1992)
- Sankari v. United States Department of State, No. 24-12975, 2025 U.S. Dist. LEXIS 103480, at *14-*15, *20 & n.6 (E.D. Mich. May 30, 2025)
- Karimova v. Abate, No. 23-5178, 2024 U.S. App. LEXIS 18337, at *10, *15 (D.C. Cir. July 24, 2024)
- Sackett v. EPA, 566 U.S. 120, 127 (2012)
- United States ex rel. Dingle v. BioPort Corp., 270 F. Supp. 2d 968, 972 (W.D. Mich. 2003)
- Shelby Advocates for Valid Elections v. Hargett, 947 F.3d 977, 982 (6th Cir. 2020)
- Steel Co. v. Citizens for a Better Environment, 523 U.S. 83, 94 (1998)
- Freed v. Thomas, 976 F.3d 729, 739 (6th Cir. 2020)