



CAIR Legal Defense Fund

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May 8, 2026

Port Director Jason W. Schmelz
Port of Entry #3501
5600 W American Blvd, Suite 760
Bloomington, MN 55437
Fax: 952-857-3230

via electronic fax

RE: Demanding Return of Client's Cell Phone Seized at MSP Port of Entry

Dear Director Schmelz:

On behalf of our client, Ms. Janette Zahia Corcelius, the Council on American-Islamic Relations Legal Defense Fund (CAIR LDF) and CAIR-Minnesota write to demand the immediate return of our client's cell phone and personal property, which were illegally seized last week at the Minneapolis-St. Paul International Airport. Any search of Ms. Corcelius' electronic device would be a further violation of her constitutional rights.

Background

On April 30, 2026, DHS agents at the Minneapolis-St. Paul International Airport (MSP, Port Code 3501) targeted our client, Ms. Janette Zahia Corcelius, and seized her cell phone along with a large quantity of political literature in her possession. Ms. Corcelius, a Muslim American and Twin Cities labor organizer, re-entered the United States after completing a two-week tour of Europe. While abroad, she embarked on a mission to promote the March 2026 Resolution passed by the City of Minneapolis, which calls on European financial institutions to "divest from all major DHS and ICE contractors, including Palantir, Geo Group, CoreCivic, and CACI International."

When Ms. Corcelius arrived at the MSP customs checkpoint, she exercised her constitutional right to opt out of a facial scan. DHS agents then detained her in a secondary screening area and invasively searched her belongings. During the encounter, Ms. Corcelius called her attorney on her cell phone and handed the phone to the CBP manager on duty. Additional DHS agents arrived and demanded to further examine Ms. Corcelius' luggage. The agents separated and seized all of the political literature she had collected during her trip and declared that they would not return her cell phone. They offered no explanation for the seizures and provided no timeline for the return of her belongings.

Our Demand

On behalf of Ms. Corcelius, we call for the Government to (1) immediately return her cell phone and all other personal property; (2) refrain from or immediately stop any advanced search of her cell phone; and (3) delete any data already obtained by a search of her belongings.

The indefinite seizure and presumptive advanced search of Ms. Corcelius' cell phone is a violation of her



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Fourth Amendment rights. The Government had nothing approaching the requisite suspicion necessary to conduct an advanced, non-routine search of her electronic device. DHS agents had no basis to believe that Ms. Corcelius' phone contained contraband or any evidence of criminal activity. Presuming that the Government seized and searched her phone pursuant to its claim of authority under CBP Directive 3340-049B ("Border Search of Electronic Devices"), DHS agents lacked even that level of suspicion—which federal courts have repeatedly found cannot legally justify the Government's forensic search of electronic devices.

The additional seizure of mere political literature, listed on the detention receipt as "169 miscellaneous items," creates a heightened concern that DHS agents targeted Ms. Corcelius for her political beliefs and associations—a plainly unconstitutional objective in violation of her First Amendment rights. Ms. Corcelius is a U.S. citizen, a labor organizer, a member of the Office and Professional Employees International Union, Local 12 (OPEIU12), a member of the Democratic Socialists of America, and an advocate against human rights abuses around the world, including in Palestine. Her speech and organizational memberships are protected by the United States Constitution.

We demand a response from the Government by May 15, 2026, and intend to raise this issue in federal court. In anticipation of a request for emergency injunctive relief, we write pursuant to Rule 65(b)(1)(B) of the Federal Rules of Civil Procedure.

Respectfully,

/s/ John Fossum

John Fossum
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