

**EXHIBIT**

1

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF )  
UNIVERSITY PROFESSORS, ET AL., )  
Plaintiffs, )  
v. )  
MARCO RUBIO, in his official capacity )  
as Secretary of State, and the )  
DEPARTMENT OF STATE, ET AL., )  
Defendants. )

Civil Action No. 1:25-cv-10685-WGY

**CERTIFIED  
ADMINISTRATIVE RECORD**

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**EXHIBIT**

2

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

I, Larry W. Talbott, hereby declare under penalty of perjury:

1. I am employed by the United States Department of State, Bureau of Consular Affairs, Visa Office, Office of Information Management and Liaison. The facts attested to herein are based upon my personal knowledge and upon information provided to me in my official capacity.
2. Noting that this is not a traditional Administrative Record, because it is addressing the *absence* of a policy alleged to exist in litigation, and is further compiled for purposes of non-traditional review in a Rule 65(a) expedited proceeding, I certify that the following documents annexed hereto constitute the Department of State's administrative record in this matter, which consists of the declaration of John Armstrong, dated April 11, 2025, previously submitted to this Court (Dkt. # 65-1), describing the Department of State's requirements and policies relating to visa revocation and affirming that it is not true that the

Department is approving visa revocations for "ideological deportation" reasons, a true and correct version of the Department of State Cable 26168, redacted for Law Enforcement Privilege, and the following documents related to five individuals, filed in separate litigation:

- a. Khalil Notification of Removability Determination under INA 237(a)(4)(C)
- b. Mahdawi Notification of Removability Determination under INA 237(a)(4)(C)
- c. Ozturk Visa Revocation – Memo for ICE
- d. Chung Notification of Removability Determination under INA 237(a)(4)(C)
- e. Suri Notification of Removability Determination under INA 237(a)(4)(C)

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1476, that the foregoing is true and correct to the best of my knowledge.

*Larry W. Talbott*

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Larry W. Talbott  
Deputy Director  
Office of Information Management and Liaison  
Visa Office, Bureau of Consular Affairs  
U.S. Department of State

EXHIBIT

3

UNITED STATES DISTRICT COURT  
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AMERICAN ASSOCIATION OF )  
UNIVERSITY PROFESSORS, ET AL., ) Civil Action No. 1:25-cv-10685-WGY  
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)  
MARCO RUBIO, in his official capacity )  
as Secretary of State, and the )  
DEPARTMENT OF STATE, ET AL., )  
)  
Defendants. )  
)

I, Akil Baldwin, hereby declare under penalty of perjury:

1. I am the Deputy Assistant Director for the National Security Division of Homeland Security Investigations (HSI). Prior to becoming the Deputy Assistant Director, I served as the Division Chief for the HSI Office of International Operations. I have additionally served as the HSI Attache in Hong Kong; Assistant Special Agent in Charge in New York, N.Y., and Assistant Attache in Brussels, Belgium. The facts attested to herein are based upon my personal knowledge and upon information provided to me in my official capacity.
2. Noting that this is not a traditional Administrative Record, because it is addressing the *absence* of a policy alleged to exist in litigation, and is further compiled for purposes of non-traditional review in a Rule 65(a) expedited proceeding, I certify that the declaration of HSI National Security Division Assistant Director Andre Watson, dated April 11,

2025, previously submitted to this Court (Dkt.# 65-2), describing the Department of Homeland Security's processes for identifying, disrupting and dismantling transnational criminal enterprises and terrorist organizations that threaten the security, and confirming that the Department has no official or unofficial "ideological deportation policy," is part of the U.S. Immigration and Customs Enforcement's administrative record in this matter.

- 3 In good faith, I certify the document that was put before me. There's a separate certification pertaining to other U.S. Immigration and Customs Enforcement documents and a separate certification pertaining to U.S. Department of State's documents reflected in the index and record.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1476, that the foregoing is true and correct to the best of my knowledge.

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BALDWIN

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Akil Baldwin  
Deputy Assistant Director  
National Security Division  
Homeland Security Investigations  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security

EXHIBIT

4UNITED STATES DISTRICT COURT  
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as Secretary of State, and the )  
DEPARTMENT OF STATE, ET AL., )  
)  
Defendants )  
)

I, William S. Walker, hereby declare under penalty of perjury:

1. I am the Acting Assistant Director for Domestic Operations at Homeland Security Investigations ("HSI") at U.S. Immigration and Customs Enforcement ("ICE") within the U.S. Department of Homeland Security ("DHS"). As the Acting Assistant Director, I am responsible for oversight of 30 HSI Special Agents in Charge, ensuring all field operations are working to efficiently execute the agency mission
2. I began my career with the U.S. Government as an Inspector with the former U.S. Customs Service at the Port of Philadelphia. Over 26 years, I have served as Deputy Special Agent in Charge, Assistant Special Agent in Charge, and Supervisory Special Agent with HSI. Most recently, I served as the Special Agent in Charge of HSI's New York Field Office where I oversaw over 700 investigators whose mission was investigating, disrupting, and dismantling transnational criminal organizations and

terrorist networks. In my capacity as Acting Assistant Director, I now oversee 237 Domestic Field Offices and more than 7,100 Special Agents.

3. In good faith, I certify the documents that were put before me. There's a separate certification pertaining to the U.S. Department of State's documents reflected in the index and record.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1476, that the foregoing is true and correct to the best of my knowledge.

**WILLIAM S  
WALKER**

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Date: 2025.05.29  
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William S. Walker  
HSI Acting Assistant Director for Domestic Operations  
U.S. Immigration and Customs Enforcement

EXHIBIT

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF )  
UNIVERSITY PROFESSORS, ET AL., ) Civil Action No. 1:25-cv-10685-WGY  
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**DECLARATION OF JOHN ARMSTRONG IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION**

I, John Armstrong, hereby declare under penalty of perjury:

1. I am the Senior Bureau Official within the U.S. Department of State's Bureau of Consular Affairs. I am a career member of the Senior Foreign Service with the rank of Counselor. Prior to becoming the Senior Bureau Official, I briefly served as the Deputy Assistant Secretary for Overseas Citizen Services. I served overseas as the Consul General in Lima, Peru, as Economic Counselor in Warsaw, Poland, as Consular Section Chief and Acting Deputy Chief of Mission in Nassau, Bahamas, Deputy Consul General in Kyiv, Ukraine, and Nonimmigrant Visa Chief in Bucharest, Romania. I have also previously served domestic assignments in Washington, D.C., as Director of the Office of Eastern European Affairs, Director of the Washington Passport Agency, Senior Political Officer on the Russia Desk, and Belarus Desk Officer.
2. As the Senior Bureau Official, I oversee the functions and responsibilities of the Bureau of Consular Affairs, including the Office of Overseas Citizen Services, the Office of Passport Services, and the Office of Visa Services ("Visa Office"), which encompasses all aspects of visa policy, procedures, and information related to U.S. visa issuance to foreign citizens who apply at more than 230 visa-issuing U.S. embassies and consulates.
3. I am familiar with the Department's requirements and policies relating to visa revocation. I base this declaration on my review of Department of State records and discussion with other Department of State employees.
4. The Visa Office's functions and responsibilities encompass all aspects of visa policy, procedures and information related to U.S. visa issuance to foreign citizens, who are applying at U.S. Embassies and Consulates worldwide, seeking to come to the United States. The responsibilities of the Visa Office include coordinating with other agencies to perform national security screening of foreign travelers, and providing guidance and recommendations on visa policy related to national security exclusions. Among its many functions, the Visa Office also revokes thousands of visas annually and provides guidance to the field on visa issuance, revocation and denial.

5. On January 20, 2025, President Trump issued Executive Order 14161, Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats ("E.O. 14161"). Consistent with E.O. 14161, the Visa Office has undertaken numerous efforts to "identify all resources that may be used to ensure that all aliens seeking admission to the United States, or who are already in the United States, are vetted and screened to the maximum degree possible."

6. On January 29, 2025, President Trump issued Executive Order 14188, Additional Measures to Combat Anti-Semitism ("E.O. 14188"). Pursuant to E.O. 14188, the Visa Office and other relevant offices at State are working with the Department of Education and the Department of Homeland Security ("DHS") on appropriate ways to "familiariz[e] institutions of higher education with the grounds for inadmissibility under 8 U.S.C. 1182(a)(3) so that such institutions may monitor for and report activities by alien students and staff relevant to those grounds and for ensuring that such reports about aliens lead, as appropriate and consistent with applicable law, to investigations and, if warranted, actions to remove such aliens."

7. One of the tools in place to ensure maximum vetting of visa applicants and visa-holders, including students, is the Department's long-standing continuous vetting program. All visa-holders are continuously vetted by law enforcement and intelligence agencies for information that surfaces after visa issuance. Processes for coordinated security-related continuous vetting have been used by the State Department and partner agencies for over 10 years.

8. The Department of State has the authority to revoke visas under Section 221(i) of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1201(i), which states, in pertinent part: "After the issuance of a visa or other documentation to any alien, the consular officer or the Secretary of State may at any time, in his discretion, revoke such visa or other documentation." For example, the Department may revoke a visa if information arises that indicates an alien is potentially ineligible for that visa or that revocation is otherwise warranted, including, for example, if the alien poses a threat to U.S. public safety. The Visa

Office provides notice to DHS when a visa is revoked.

9. A visa is revoked only after the Department of State reviews available information to ascertain whether the visa revocation is supported by the facts and law.

10. Given the Department's commitment to, and responsibility for, national security, the Visa Office uses all available resources in its visa screening and vetting both when making the initial visa adjudication and during recurrent vetting.

11. Information on visa-holders can come directly from interagency partners, from offices within the Department of State, or from public sources. The Visa Office has long-standing relationships with U.S. law enforcement agencies who regularly send the Visa Office information when they believe derogatory information merits a revocation. This includes information from DHS and the Federal Bureau of Investigation.

12. A visa can be revoked for any potential ineligibility under U.S. law, including but not limited to potential ineligibility for a visa under one of the "Security and related grounds" of inadmissibility at section 212(a)(3) of the INA. The "Security and related grounds" include terrorism related inadmissibility grounds, such as endorsing or espousing terrorist activity or persuading others to endorse or espouse terrorist activity or support a terrorist organization, as well as engaging in terrorist activity by providing material support to a designated or undesignated terrorist organization. That section also includes an inadmissibility ground for foreign policy reasons, when the Secretary of State has reasonable ground to believe an alien's entry or proposed activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

13. The Bureau of Consular Affairs, including the Office of Visa Services, does not carry out deportations. DHS's Immigration and Customs Enforcement ("ICE") is responsible for immigration enforcement in the United States, including initiating proceedings against aliens charged as removable.

14. As deportations are carried out by DHS, deportation policy is outside the purview of the Bureau of Consular Affairs. No ideological deportation policy has been developed or

implemented by the Bureau of Consular Affairs or the Visa Office.

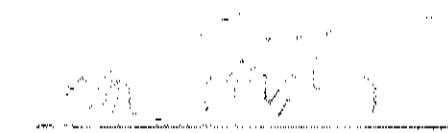
15. I am aware of Secretary Rubio's public remarks indicating the U.S. government will revoke visas of and deport Hamas supporters. These statements are consistent with the State Department's long-standing implementation of visa and immigration laws, across administrations. Hamas has been a designated foreign terrorist organization under section 219 of the INA since it was designated by former Secretary Madeleine Albright in 1997. Support for a designated terrorist organization by statute is a basis for visa refusal and other immigration consequences: the INA provides that an alien who persuades others to support a terrorist organization, or who has afforded material support to a designated terrorist organization, is inadmissible and deportable. INA §§ 212(a)(3)(B), 237(a)(4)(B).

16. I am aware of plaintiffs' contention that the State Department and ICE have launched new social media surveillance programs aimed at identifying noncitizen students and faculty with alleged terrorist sympathies. It is true that the State Department has authored new guidance to consular officers on reviewing visa applicants' social media. However, it is misleading and false to refer to the Department's review of publicly available social media as a form of "surveillance" to root out "terrorist sympathies" among students and faculty. Rather, review of publicly available social media is a component of the extensive information-collection and vetting process foreign visitors undergo when they apply for and use U.S. visas.

17. I am aware of plaintiffs' contentions regarding Secretary Rubio's March 16, 2025, interview on the television news show *Face the Nation*. I understand Secretary Rubio's comments to refer to the ongoing work of the Visa Office to revoke visas, revocations which occur for a wide variety of reasons. Secretary Rubio did not state, and it is not true, that the Visa Office is approving visa revocations every day for "ideological deportation" reasons. This assertion is simply false.

I declare under the penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge.

Executed on this 11<sup>th</sup> day of April, 2025.



John Armstrong  
Senior Bureau Official  
Bureau of Consular Affairs  
U.S. Department of State

EXHIBIT

**6**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATION OF  
UNIVERSITY PROFESSORS., *et al.*,

Plaintiffs,

v.

MARCO RUBIO, *et al.*,

Defendants.

No. 1:25-CV-10685

**DECLARATION OF ANDRE WATSON**

I, Andre Watson pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the Senior Official within the National Security Division (NSD) for Homeland Security Investigations (HSI). I am a career member of the Senior Executive Service with the rank of Assistant Director. Prior to becoming the Assistant Director of NSD, I served on a detail assignment to the U.S. Department of Homeland Security in the capacity of Principal Deputy Assistant Secretary for the Countering Weapons of Mass Destruction Office. I served as the HSI Special Agent in Charge in Baltimore, M.D., Deputy Special Agent in Charge in Washington, D.C., Assistant Special Agent in Charge in Houston, T.X., and Supervisory Special Agent in Blaine, W.A. I have also previously served in Headquarters assignments as Chief of Staff to the Deputy Director of U.S. Immigration and Customs Enforcement (ICE), Chief of Intelligence for the U.S. Department of Justice, International Organized Crime and Intelligence Operations Center, and various supervisory positions within NSD.

2. As the Senior Official within NSD, I oversee the National Security as well as Student and Exchange Visitor Programs functions in support of ICE efforts to identify, disrupt and dismantle transnational criminal enterprises and terrorist organizations that threaten the security of the United States. These efforts encompass all investigations and aspects of terrorism, special interests involving state and non-state actors, human rights violators and war criminals as well as compliance and oversight functions for over 6,900 academic institutions, 45,000 designated school officials, and over 1.2 million foreign students studying in the United States.

3. HSI is a component of ICE that conducts significant and complex criminal investigations into individuals and international criminal networks that violate U.S. laws. HSI focuses its efforts on combating the transnational criminal networks that pose the greatest threats to the security of the United States. HSI has more than 10,000 employees stationed in more than 235 U.S. cities and more than 50 countries worldwide. The HSI workforce is made up of special agents, criminal analysts, intelligence analysts, and support personnel who live and work in the communities they are sworn to protect and serve.

4. The Student and Exchange Visitor Program (SEVP), a component of HSI's National Security Division, was created in the wake of 9/11 to provide integrity to the immigration system by collecting, maintaining and analyzing information so only legitimate nonimmigrant students or exchange visitors can gain entry in the U.S. Through a database housing information pertaining to schools and students, the Student and Exchange Visitor Information System (SEVIS), SEVP manages and tracks nonimmigrants in the F, M, and J categories. To eliminate vulnerabilities related to the nonimmigrant visa program, Congress first introduced statutory language mandating the development of a program to collect data and improve tracking of foreign students in the Illegal Immigration Reform and Immigrant Responsibility Act of (IIRIRA) of 1996. In 2001, Congress

expanded the foreign student tracking system when it enacted PATRIOT ACT, and in 2002 Congress strengthened the tracking system yet again, through the Enhanced Border Security and Visa Entry Reform Act, noting concerns with national security and emphasizing the need to carefully track student status and information. Accordingly, these laws and regulations demonstrate a clear congressional directive that ICE closely monitor foreign students and the schools in which they enroll by vigorously enforcing statutory and regulatory requirements.

5. I am aware of the above-captioned lawsuit. I provide this declaration based on my personal knowledge, reasonable inquiry, and information obtained from various records, systems, databases, other Department of Homeland Security (DHS) employees, and information portals maintained and relied upon by DHS in the regular course of business.

6. On January 29, 2025, President Trump issued Executive Order 14188, *Additional Measures to Combat Anti-Semitism* (E.O. 14188). ICE remains steadfast in its commitment to enforcing E.O. 14188 prohibiting anti-Semitism and safeguarding national security by applying existing authorities consistent with the priorities set forth in the E.O. 14188.

7. In applying existing authorities, HSI Office of Intelligence proactively reviews open-source information to identify individuals within the parameters of E.O. 14188. Open-source information is defined as unclassified information that has been published or broadcast in some manner to the general public, could be lawfully seen or observed by a casual observer, is made available at a meeting open to the public, or is obtained by visiting any place or attending any event that is open to the public.

8. The U.S. Department of State (DOS) has broad discretion under 8 U.S.C. § 1201(i) to revoke visas and make determinations of whether an alien's present or activities in the United States would have potentially serious adverse foreign policy consequences. ICE does not make

those determinations. Upon notification of DOS determination, ICE may take subsequent enforcement actions such as placing the alien in removal proceedings under the Immigration and Nationality Act (INA). HSI's Counter Threat Lead Development Unit (CTLD) is specifically responsible for analyzing alien nonimmigrant status violators, lawfully admitted to the United States, who violate the terms of their admission and pose a threat to national security, public safety and/or are involved in criminal activity for field referral and further investigation. Since 2003, the National Security Division has overseen this mission. Currently, CTLD receives over one million alien violator records each year, primarily from U.S. Customs and Border Protection (CBP) Arrival and Departure Information System (ADIS), as well as from SEVIS. CTLD generates viable, investigative leads on nonimmigrant overstays with national security and public safety concerns and/or criminal activity to HSI field offices for further action. CTLD may also provide information to DOS for possible visa revocation if appropriate. .

9. Procedurally, once DOS notifies ICE of its decisions concerning whether to revoke a visa or make certain determinations that would render a alien removable, the determination is then disseminated to the local field office for additional enforcement actions against the student (e.g., issuing a Notice to Appear in removal proceedings) if appropriate.

10. Enforcement actions carried out against aliens within the purview of E.O.14188 occur pursuant to ICE's existing civil immigration authorities under the INA. There is no official or unofficial "ideological deportation policy." Aliens may be charged with any deportation ground under the INA supported by fact and law.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of April 2025.

**ANDRE R  
WATSON**

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ANDRE R WATSON  
Date: 2025.04.11  
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Andre Watson, Assistant Director  
National Security Division  
Homeland Security Investigations  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11th day of April 2025.

**ANDRE R  
WATSON**

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ANDRE R WATSON  
Date: 2025-04-11  
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Andre Watson, Assistant Director  
National Security Division  
Homeland Security Investigations  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security

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EXHIBIT

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SBU

MRN: 25 STATE 26168  
 Date/DTG: Mar 25, 2025 / 251914Z MAR 25  
 From: SECSTATE WASHDC  
 Action: ALL DIPLOMATIC AND CONSULAR POSTS COLLECTIVE *immediate*  
 E.O: 13526  
 TAGS: CVIS, CMGT, PTER, KFRD  
 Captions: SENSITIVE  
 Reference: 25 STATE 5914  
 Subject: (U) Action Request: Enhanced Screening and Social Media Vetting for Visa Applicants

1. (U) This is an action request. See paragraph 7.
2. (SBU) **SUMMARY:** The protection of our nation and its citizens is a consular officer's first consideration. Pursuant to the implementation of Executive Order (E.O.) 14161 and E.O. 14188, known respectively as *Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats and Additional Measures to Combat Anti-Semitism*, effective immediately, consular officers must refer certain student and exchange visitor (F, M, and J) visa applicants to the Fraud Prevention Unit (FPU) for a mandatory social media check as described below. As the Secretary stated on March 16, "We don't want people in our country that are going to be committing crimes and undermining our national security or the public safety. It's that simple. Especially people that are here as guests. That is what a visa is...It is a visitor into our country. And if you violate the terms of your visitation, you are going to leave." The Visa Office will host webinars for consular officers to discuss this guidance on April 3 and April 4, 2025. **END SUMMARY.**
3. (SBU) **Consular Officers Play a Critical Role in Protecting National Security:** As part of screening every case for potential ineligibilities, consular officers **MUST ADDRESS** any derogatory information indicating that a visa

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applicant may be subject to the terrorism-related ineligibility grounds of the Immigration and Nationality Act (INA). This includes advocating for, sympathizing with, or persuading others to endorse or espouse terrorist activities or support a DESIGNATED FOREIGN TERRORIST ORGANIZATION (FTO).

**4. (SBU) Every Visa Decision is a National Security Decision:** In Ref A, the Visa Office directed consular officers to maintain extra vigilance and to comprehensively review and screen every visa applicant for potential security and non-security related ineligibilities including to assess whether the applicant poses a threat to U.S. national security. Any nonimmigrant visa applicant who has not established to a consular officer's satisfaction that the applicant meets all standards required in that visa classification should be refused under 214(b), as appropriate. This includes establishing that the applicant does not intend to engage in activities inconsistent with the requested visa status. If 214(b) does not apply to the visa classification, consular officers should refuse any nonimmigrant or immigrant visa case presenting such concerns under section 221(g) of the INA for further review of additional ineligibility grounds,

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LE as appropriate.

**5. (U)** This was reflected well by the Secretary's statement on March 16, that "when you apply to enter the United States and you get a visa, you are a guest...if you tell us when you apply for a visa, 'I'm coming to the U.S. to participate in pro-Hamas events,' that runs counter to the foreign policy interest of the United States...if you had told us you were going to do that, we never would have given you the visa."

**6. (SBU) Situations that Cast Doubt on Students' Intent or Credibility:** As described in 9 FAM 402.5 5(C), an applicant applying for an F-1 or M-1 student visa must demonstrate intent to enter the United States solely to pursue a full course of study at an approved institution. In addition, J-1 visa applicants who are college, university, and other post-secondary students are required to pursue a full course of study as described in 9 FAM 402.5 6(E)(11). Evidence suggesting a student visa applicant intends to travel to

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the United States to engage in unlawful activities clearly calls into question whether the applicant possesses intent and/or the ability to solely pursue a full course of study. While many activities may not fall under the INA's definitions of "terrorist activity," you should otherwise consider that information in assessing the credibility of a visa applicant's claimed purpose of travel. INA section 214(b) requires the applicant to show credibly that all activities in which he or she is expected to engage in while in the United States are consistent with the specific requirements of their visa classification.

**7. (SBU) ACTION REQUEST: Mandatory Social Media Reviews for Students and Student Exchange Visitors.** Effective immediately, consular officers must refer all new or returning F-1, M-1, or student J-1 visa applications meeting one or more of the following criteria, that the consular officer has determined is otherwise eligible for the requested nonimmigrant status, to the FPU via ECAS as described in 7 FAH-1 H-945.4, using the SOCIAL MEDIA REVIEW category.

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**8. (SBU) Documenting the Results of the Social Media Review:** If the social media review uncovers potentially derogatory information indicating that the applicant may not be eligible for a visa, Fraud Prevention Units are required to take screenshots of social media findings to the extent it is relevant to a visa ineligibility, to preserve the record against the applicant's later alteration of the information. Limit screenshots to information relevant to connecting the applicant, the applicant's actions, and a visa ineligibility.

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**9. (SBU) Support for Terrorist Organizations - Grounds and Definitions for INA 212(a)(3)(B):** All consular officers should carefully review 9 FAM 302.6 to understand the grounds under which an applicant may be ineligible under 3B, including that an applicant who "endorses or espouses terrorist activity or persuades others to endorse or espouse terrorist activity or support a terrorist organization" is ineligible. Consular officers should consider these grounds and definitions when conducting interviews and pursuing lines of inquiry. Because terms in INA 212(a)(3)(B) are broadly defined, consular officers should elicit as much pertinent information as possible from visa applicants with suspected ties to terrorist organizations or terrorist activity. This includes the names of all relevant organizations potentially involved in terrorist activity and the applicant's relationship with them (for example, by current membership or past financial contributions or other support). Evidence that an applicant advocates for terrorist activity, or otherwise demonstrates a degree of public approval or public advocacy for terrorist activity or a terrorist organization, may be indicative of ineligibility under INA 212(a)(3)(B). This may be evident in conduct that bears a hostile attitude toward U.S. citizens or U.S. culture (including government, institutions, or founding principles). Or it may be evident in advocacy or sympathy for foreign terrorist organizations. All of these matters may open lines of inquiry regarding the applicant's credibility and purpose of travel. Consular officers should inquire into the nature and activities of those organizations.

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**10. (SBU) Intention to Engage in Unlawful Activity:** Consular officers are also reminded of guidance in 9 FAM 302.5-4 regarding the applicability of INA 212(a)(3)(A)(ii) under which a visa applicant is ineligible if the consular officer knows or has reason to believe that the applicant is traveling to the United States solely, principally, or incidentally to engage in any other unlawful activity. Consular officers should take care to enter detailed case notes regarding the specific activities expected in the United States and request an advisory opinion per 9 FAM 302.5-4(C).

**11. (SBU) Revocations of Valid Visas:** If, subsequent to visa issuance, information becomes available to post that an individual may no longer be eligible for a visa due to particularized information indicating an ineligibility under specific INA provisions, including 214(b), post should follow the procedures to revoke or request prudential revocation as described in 9 FAM 403.11 for nonimmigrant visas or 9 FAM 504.12 for immigrant visas. The Visa Office reminds posts that consular officers do not have the authority to revoke a visa based on a suspected ineligibility or based on derogatory information that is insufficient to support an ineligibility finding - other than a revocation based on driving under the influence (DUI) - and that such cases should be referred **LE** in accordance with 9 FAM 403.11-5(B) for further review. A consular officer's revocation must be based on an actual finding that the individual is ineligible for the visa.

**12. (U) Additional Guidance:** The Visa Office will host webinars for consular officers to discuss this guidance on Thursday, April 3 and Friday, April 4, 2025. Invitations with links to these webinars will be sent separately. The FAM will be updated to reflect this guidance.

**13. (U) Inquiries:** Post must refer any U.S. media inquiries regarding E.O.s to CA-Press@state.gov and congressional inquiries regarding E.O.s to ConsularOnTheHill@state.gov. Posts may respond to requests from

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international media regarding E.O.s using CA's cleared press guidance located on CA Web, copying CA-PRESS@STATE.GOV.

14. (U) Minimize considered.

**MINIMIZE CONSIDERED**

Signature: RUBIO

XMT: BASRAH, AMCONSUL; CARACAS, AMEMBASSY; CHENGDU, AMCONSUL; KABUL, AMEMBASSY; MINSK, AMEMBASSY; SANAA, AMEMBASSY; ST PETERSBURG, AMCONSUL; VLADIVOSTOK, AMCONSUL; YEKATERINBURG, AMCONSUL

**UNCLASSIFIED**

SBU

EXHIBIT

8

THE SECRETARY OF STATE  
WASHINGTONSENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

## MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio *9/1/26*

SUBJECT: (SBU) Notification of Removability Determinations under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 7, 2025, I have determined that [REDACTED]

[REDACTED] and Mahmoud Khalil (DOB [REDACTED] POB: Algeria), both U.S. Lawful Permanent Residents (LPRs), are deportable aliens under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against them, based on assurances from DHS/ICE/HSI.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that the activities and presence of these aliens in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest. These determinations are based on

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

Classified by: Secretary of State Marco Rubio  
E.O. 13526, Reason(s): 1.4 (justification sections)  
Declassify: *9/1/26*, *00/00/00*, *YYYY*

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

information provided by the DHS/ICE/HSI regarding the participation and roles of [REDACTED] and Khalil in antisemitic protests and disruptive activities, which fosters a hostile environment for Jewish students in the United States. My determination for [REDACTED] is also based on [REDACTED] citations for unlawful activity during these protests. The public actions and continued presence of [REDACTED] and Khalil in the United States undermine U.S. policy to combat anti-Semitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and violence in the United States. Consistent with E.O. 14150, America First Policy Directive to the Secretary of State, the foreign policy of the United States champions core American interests and American citizens and condoning anti-Semitic conduct and disruptive protests in the United States would severely undermine that significant foreign policy objective.

#### Attachments

- Tab 1 – DHS Letter on [REDACTED]
- Tab 2 – HSI Subject Profile of [REDACTED]
- Tab 3 – DHS Letter on Mahmoud Khalil
- Tab 5 – HSI Subject Profile of Mahmoud Khalil
- Tab 5 – 8 USC 1227(a)(4)(C)

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AAUP C.A.R.019

Uploaded on: 03/09/2025 at 10:37:47 AM (Central Daylight Time) Base City: JNA

EXHIBIT

9

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINO: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: MAHEMUD, MAHLIL

currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

You are an arriving alien.

You are an alien present in the United States who has not been admitted or paroled.

You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of SYRIA and a citizen of ALGERIA;
3. You were admitted to the United States at unknown place on or about unknown date as a unknown manner; OR Your status was adjusted to that of a lawful permanent resident on November 2024 under section 212 (a)(3)(C) of the Act;
4. The Secretary of State has determined that your presence or activities in the United States would have serious adverse foreign policy consequences for the United States.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, as amended, in that the Secretary of State has reasonable ground to believe that your presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

Section 235(b)(1) order was vacated pursuant to:  8CFR 209.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

870 PINEHILL RD JOHN DA 71342, LEBELLE DETENTION FACILITY

(Complete Address of Immigration Court, including Room Number, if any)

on March 27, 2025 at 8:30 AM to show why you should not be removed from the United States based on the  
(Date) (Time)

charge(s) set forth above.

(Signature and Title of Issuing Officer)

Date: March 9, 2025

16 Federal Plaza, New York, NY

(City and State)

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**Notice to Respondent****Warning:** Any statement you make may be used against you in removal proceedings.**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.**One-Year Asylum Application Deadline:** If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, instructions, and information on where to file the Form can be found at [www.uscis.gov/i-589](http://www.uscis.gov/i-589). Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.**Failure to appear:** You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.**Mandatory Duty to Surrender for Removal:** If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.dhs.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.**U.S. Citizenship Claims:** If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.**Sensitive locations:** To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.**Request for Prompt Hearing**

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before: \_\_\_\_\_

(Signature of Respondent)

Date: \_\_\_\_\_

(Signature and Title of Immigration Officer)

**Certificate of Service**This Notice To Appear was served on the respondent by me on March 9, 2025, in the following manner and in compliance with section 239(a)(1) of the Act:

in person    by certified mail, returned receipt # \_\_\_\_\_ requested    by regular mail

Attached is a credible fear worksheet.

Attached is a list of organizations and attorneys which provide free legal services.

The alien was provided oral notice in the \_\_\_\_\_ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

Refused to sign 16

(Signature of Respondent & Personally Served)

(Signature and Title of officer)

Uploaded on: 03/09/2025 at 10:37:47 AM (Central Daylight Time) Base City: JNA

Case Type: Immigration Act:

Designated for review: NMOCBIS | Alternative Disposition: NYPAJ

**Authority:**

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

**Purpose:**

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

**Routine Uses:**

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a (note)), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/systems-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EDIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/oip/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EDIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

**Disclosure:**

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date, however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

Uploaded on: 03/17/2025 at 05:02:12 PM (Central Daylight Time) Base City: JNA

EXHIBIT

10

U.S. Department of Homeland Security  
Immigration and Customs Enforcement

Additional Charges of Inadmissibility / Deportability

 Removal proceedings under section 240 of the Immigration and Nationality Act Deportation proceedings commenced prior to April 1, 1997, under former section 242 of the Immigration and Nationality Act

In the Matter of:

Alien/Respondent: Mahmoud Khalil

File No: A [REDACTED] Address: [REDACTED]

1. You are an arriving alien.  
 2. You are an alien present in the United States who has not been admitted or paroled.  
 3. You have been admitted to the United States, but are removable for the reasons stated below.

There is/are hereby lodged against you the following allegation(s), [ ] in addition to or [X] in lieu of, those set forth in the original charging document:

1. You are not a citizen or national of the United States;
2. You are a native of Syria and a citizen of Algeria;
3. You were admitted to the United States at John F. Kennedy International Airport, Queens, New York, on or about December 20, 2022, as an F-1 nonimmigrant student to attend Columbia University in New York, New York;
4. Your status was adjusted to that of a conditional lawful permanent resident on November 16, 2024, based on marriage to a U.S. Citizen spouse, under section 245(a) of the Immigration and Nationality Act;
5. The Secretary of State has determined that your activities and presence in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest;
6. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question at part 8, page 9, you failed to disclose that you were a member of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA) from June through November 2023, as a political affairs officer;
7. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question at part 3, page 6, you failed to disclose your continuing employment as a Program Manager by the Syria Office in the British Embassy in Beirut beyond 2022.
8. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question part 8, page 9, you failed to disclose that you were a member of the Columbia University Apartheid Divest (CUAD).

There is/are hereby lodged against you the following charge(s), [X] in addition to or [ ] in lieu of, those set forth in the original charging document:

Section 237(a)(1)(A) of the Immigration and Nationality Act, as amended, in that at the time of entry or of adjustment of status, you were within one or more of the classes of aliens inadmissible by the law existing at such time, to wit: aliens who seek to procure, or have sought to procure, or who have procured a visa, other documentation, or admission into the United States, or other benefit provided under the Act, by fraud or by willfully misrepresenting a material fact, under Section 212(a)(6)(C)(i) of the Act.

3/17/2025

(Signature of Deportation Officer)

Dated:

Uploaded on: 03/17/2025 at 05:02:12 PM (Central Daylight Time) Base City: JNA

### Notice to Respondent

**Warning:** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this Notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing, you will be given the opportunity to admit or deny any or all of the allegations in the charging document and that you are inadmissible or deportable on the charges contained in the charging document. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

**Failure to appear:** You are required to provide the INS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the INS.

### Certificate of Service

This charging document was served on the respondent on 3/17/25, in the following manner in compliance with section 239(e)(1)(F) of the Act.

in person  by certified mail, return receipt requested  by regular mail

to:

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in Section 240(b)(7) of the Act.

Refuse to sign

(Signature of respondent if personally served)

(Signature and title of officer)

EXHIBIT  
11

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. [REDACTED]

Date: 03/09/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that KHALIL, MAHMOUD is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

[REDACTED]  
(Signature of Authorized Immigration Officer)

[REDACTED]  
(Printed Name and Title of Authorized Immigration Officer)

**Certificate of Service**

I hereby certify that the Warrant for Arrest of Alien was served by me at Federal Plaza, New York.  
(Location)

on KHALIL, MAHMOUD on March 9, 2025, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the [REDACTED] language.  
(Language)

Name and Signature of Officer

Name or Number of Interpreter (if applicable)

EXHIBIT

11

## U.S. DEPARTMENT OF HOMELAND SECURITY

## Warrant for Arrest of Alien

File No. [REDACTED]

Date: 03/09/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that KHALIL, MAEMOUD is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

[REDACTED]  
(Signature of Authorized Immigration Officer)

[REDACTED]  
(Printed Name and Title of Authorized Immigration Officer)

**Certificate of Service**

I hereby certify that the Warrant for Arrest of Alien was served by me at Federal Plaza, New York.  
(Location)

on KHALIL, MAEMOUD on March 9, 2025, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the [REDACTED] language.  
(Language)

Name and Signature of Officer

Name or Number of Interpreter (if applicable)

EXHIBIT

12

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio

SUBJECT: (SBU) Determination of Deportability under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 14, 2025, I have determined that Mohsen MAHDAWI (DOB: [REDACTED]; [REDACTED]; POB: Israel), a U.S. Lawful Permanent Resident (LPR), is a deportable alien under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against him, based on assurances from DHS/ICE/HSI.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that the activities and presence of this alien in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest. These determinations are based on information provided by DHS/ICE/HSI that Mahdawi, through his leadership

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

-2-

and involvement in disruptive protests at Columbia University, has engaged in anti-Semitic conduct through leading pro-Palestinian protests and calling for Israel's destruction. Mahdawi has been identified at those protests as having engaged in threatening rhetoric and intimidation of pro-Israeli bystanders. The activities and presence of Mahdawi in the United States undermines U.S. policy to combat anti-Semitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and violence in the United States. Under E.O. 14188, Additional Measures to Combat Anti-Semitism, it is the policy of the United States to combat antisemitism, using all available and appropriate legal tools to hold to account the perpetrators of unlawful anti-Semitic harassment and violence. Consistent with E.O. 14150, America First Policy Directive to the Secretary of State, the foreign policy of the United States champions core American interests and American citizens and condoning anti-Semitic conduct and disruptive protests in the United States would severely undermine that significant foreign policy objective. Moreover, protests of the type led by Mahdawi potentially undermine the peace process underway in the Middle East by reinforcing anti-Semitic sentiment in the regional and thereby threatening the U.S. foreign policy goal of peacefully resolving the Gaza conflict.

(SBU) The Department of State also requests the opportunity to consult with the Department of Homeland Security on any public statements regarding this determination.

(SBU) I hereby expressly authorize use of this notification by the Department of Homeland Security in immigration court.

#### Attachments

Tab 1 – DHS Letter on Mohsen Mahdawi

Tab 2 – HSI Subject Profile of Mohsen Mahdawi

Tab 3 – 8 USC 1227(a)(4)(C)

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE  
AAUP C.A.R.027

Uploaded on: 04/16/2025 at 06:19:06 AM (Central Daylight Time) Base City: OAK

EXHIBIT

13

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: [REDACTED]

## In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

File No: [REDACTED]

## In the Matter of:

Respondent: MOHSEN KHADER MAHDawi AKA: MEHDawi, Mohsen currently residing at:

[REDACTED] (Number, street, city, state and ZIP code)

[REDACTED] (Area code and phone number)

You are an arriving alien.

You are an alien present in the United States who has not been admitted or paroled.

You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of Stateless and a citizen of Stateless;
3. You were admitted to the United States, on or about July 1, 2014, at Los Angeles International Airport, Los Angles, California, as a conditional resident (CR6);
4. Your status was adjusted to that of a lawful permanent resident on October 24, 2014, based on marriage to a U.S. Citizen spouse, under section 245(a) of the INA;
5. The Secretary of State has determined that your presence and activities in the See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, as amended, in that the Secretary of State has reasonable ground to believe that your presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

3843 E STAGG AVE BASILE LA 70515. SOUTH LOUISIANA CORR CENTER

(Complete Address of Immigration Court, including Room Number, if any)

on May 1, 2025 at 8:30 AM to show why you should not be removed from the United States based on the

(Date) (Time)

charge(s) set forth above.

(Signature and Title of Issuing Officer)

Date: April 14, 2025

South Burlington, Vermont

(City and State)

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: MOHSEN KHADER MAHDawi AKA: MEHDawi, Mohsen

currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

You are an arriving alien.

You are an alien present in the United States who has not been admitted or paroled.

You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of Stateless and a citizen of Stateless;
3. You were admitted to the United States, on or about July 1, 2014, at Los Angeles International Airport, Los Angles, California, as a conditional resident (CR6);
4. Your status was adjusted to that of a lawful permanent resident on October 24, 2014, based on marriage to a U.S. Citizen spouse, under section 245(a) of the INA;
5. The Secretary of State has determined that your presence and activities in the See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, as amended, in that the Secretary of State has reasonable ground to believe that your presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

3843 E STAGG AVE BASILE LA 70515. SOUTH LOUISIANA CORR CENTER

(Complete Address of Immigration Court, including Room Number, if any)

on May 1, 2025 at 8:30 AM to show why you should not be removed from the United States based on the  
(Date) (Time)

charge(s) set forth above.

(Signature and Title of Issuing Officer)

Date: April 14, 2025

South Burlington, Vermont

(City and State)

Uploaded on: 04/16/2025 at 06:19:06 AM (Central Daylight Time) Base City: OAK

**Notice to Respondent**

**Warning:** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

**One-Year Asylum Application Deadline:** If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at [www.uscis.gov/i-589](http://www.uscis.gov/i-589). Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

**Failure to appear:** You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

**Mandatory Duty to Surrender for Removal:** If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.dhs.gov/contact/cro>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

**U.S. Citizenship Claims:** If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

**Sensitive locations:** To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

**Request for Prompt Hearing**

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before: \_\_\_\_\_

(Signature of Respondent)

Date: \_\_\_\_\_

(Signature and Title of Immigration Officer)

**Certificate of Service**

This Notice To Appear was served on the respondent by me on 04/14/2025, in the following manner and in compliance with section 239(a)(1) of the Act.

in person    by certified mail, returned receipt # \_\_\_\_\_ requested    by regular mail  
 Attached is a credible fear worksheet.  
 Attached is a list of organizations and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

Refused to sign w/out attorney present

(Signature of Respondent if Personally Served)

(Signature and Title of Officer)

Uploaded on: 04/16/2025 at 06:19:06 AM (Central Daylight Time) Base City: OAK

**Notice to Respondent**

**Warning:** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

**One-Year Asylum Application Deadline:** If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at [www.uscis.gov/i-589](http://www.uscis.gov/i-589). Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

**Failure to appear:** You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

**Mandatory Duty to Surrender for Removal:** If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.dhs.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

**U.S. Citizenship Claims:** If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

**Sensitive locations:** To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

**Request for Prompt Hearing**

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before: \_\_\_\_\_

(Signature of Respondent)

Date: \_\_\_\_\_

(Signature and Title of Immigration Officer)

**Certificate of Service**

This Notice To Appear was served on the respondent by me on 04/14/2025, in the following manner and in compliance with section 239(a)(1) of the Act.

in person    by certified mail, returned receipt # \_\_\_\_\_ requested    by regular mail  
 Attached is a credible fear worksheet.  
 Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

Refused to sign w/out attorney present

(Signature of Respondent if Personally Served)

(Signature and Title of officer)

Uploaded on: 04/16/2025 at 06:19:06 AM (Central Daylight Time) Base City: OAK

**Privacy Act Statement****Authority:**

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

**Purpose:**

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

**Routine Uses:**

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opc/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

**Disclosure:**

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

Uploaded on: 04/16/2025 at 06:19:06 AM (Central Daylight Time) Base City: OAK

U.S. Department of Homeland Security

Continuation Page for Form I-862

Alien's Name <b>MAHDAWI, MOHSEN KHADER</b>	File Number [REDACTED]	Date 04/14/2025
Event No: [REDACTED]		

**THE SERVICE ALLEGES THAT YOU:**

United States would have serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest.

Signature [REDACTED]	Title Supervisory Special Agent
-------------------------	------------------------------------

4 of 4 Pages

EXHIBIT

14

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. [REDACTED]

Date: 04/14/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that MAEDAWI, MOHSEN is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

[REDACTED]  
(Signature of Authorized Immigration Officer)[REDACTED]  
(Printed Name and Title of Authorized Immigration Officer)

## Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at South Burlington, VT  
(Location)

on MAEDAWI, MOHSEN on 04/14/2025, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the English language.  
[REDACTED]

[REDACTED]  
Signature of Officer

Name or Number of Interpreter (if applicable)

EXHIBIT

15

DEPARTMENT OF HOMELAND SECURITY  
NOTICE OF CUSTODY DETERMINATION

Alien's Name: MARYAM, MOHSEN PEAKER

A-File Number: [REDACTED]

Date: 04/14/2025

Event ID: [REDACTED]

Subject ID: [REDACTED]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

Detained by the Department of Homeland Security.

Released (check all that apply):

Under bond in the amount of \$ \_\_\_\_\_

On your own recognizance.

Under other conditions. [Additional document(s) will be provided.]

[REDACTED] 04/14/2025 11:18 PM

Name and Signature of Authorized Officer

Date and Time of Custody Determination

Alien's Duty Special Agent

11 ELMWOOD AVE STE 240 Burlington, VT US 05402

Title

Office Location/Address

You may request a review of this custody determination by an immigration judge.

I acknowledge receipt of this notification, and

I do request an immigration judge review of this custody determination.

I do not request an immigration judge review of this custody determination.

Refused to sign w/out attorney present  
Signature of Alien

04/14/25  
Date

The contents of this notice were read to <u>MARYAM, MOHSEN PEAKER</u> [REDACTED] (Name of Alien)	in the <u>ENGLISH</u> language. [REDACTED] (Name of Language)
Name and Signature of Officer [REDACTED]	Name or Number of Interpreter (if applicable)
Special Agent [REDACTED] Title	



United States Department of State

Washington, DC 20520

**EXHIBIT**

**16**

**SENSITIVE BUT UNCLASSIFIED**

March 21, 2025

**Memo for ICE – Andre R. Watson, Assistant Director, National Security Division**

**FROM:** CA – John L. Armstrong, Senior Bureau Official

**SUBJECT:** (SBU) Revocation of Visa – Rumeysa OZTURK

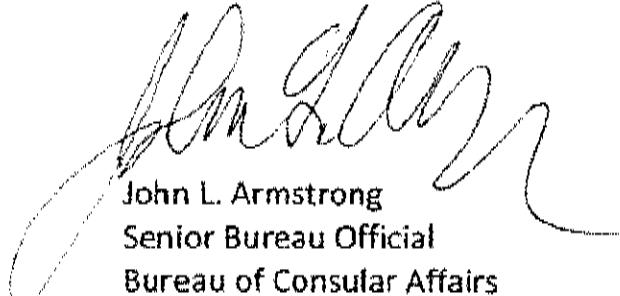
(SBU) On March 21, 2025, in response to a request from DHS/ICE and the assessment from DHS/ICE that Rumeysa OZTURK had been involved in associations that “may undermine U.S. foreign policy by creating a hostile environment for Jewish students and indicating support for a designated terrorist organization” including co-authoring an op-ed that found common cause with an organization that was later temporarily banned from campus, the Bureau of Consular Affairs approved revocation, effective immediately, of the F-1 visa of OZTURK, DPOB: [REDACTED] Turkey, Visa Foil [REDACTED] pursuant to authority in section 221(i) of the Immigration and Nationality Act, 8 U.S.C. 1201(i). Due to ongoing ICE operational security, this revocation will be silent; the Department of State will not notify the subject of the revocation.

(U) The information in this record is confidential under INA 222(f) and specific biographical data about the alien cannot be shared in public statements.

SENSITIVE BUT UNCLASSIFIED

-2-

(U) I am providing this notice to you with express authorization for use by DHS/ICE in immigration court, as needed.



John L. Armstrong  
Senior Bureau Official  
Bureau of Consular Affairs

SENSITIVE BUT UNCLASSIFIED

AAUP C.A.R.035

Uploaded on: 03/27/2025 at 02:16:50 PM (Central Daylight Time) Base City: OAK

EXHIBIT

17

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

Doc. [REDACTED]

Event No. [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS: [REDACTED]

File No. [REDACTED]

In the Matter of:

Respondent: NURAYSA OZTURK  
[REDACTED]

currently residing at

[REDACTED] (Street, City, State and Zip Code)

(Area code and phone number)

You are an arriving alien.  
 You are an alien present in the United States who has not been admitted or paroled.  
 You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of TURKEY and a citizen of TURKEY;
3. You were admitted to the United States at Boston, MA on or about June 28, 2024 as a nonimmigrant Student (F-1);
4. On March 21, 2025, your nonimmigrant visa was revoked by the United States Department of State.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(1)(B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a)(15) of the Act, your nonimmigrant visa was revoked under section 221(i) of the Act.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.  
 Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

1900 E. Whatley Rd Oakdale, LA 71463  
(Complete Address of Immigration Court, including Room Number, if any)On April 7, 2025 at 8:30 AM to show why you should not be removed from the United States based on the  
(Date) (Time)

charge(s) set forth above.

(Signature and Title of Issuer)

Date: March 25, 2025

St. Albans, VT  
(City and State)

Uploaded on: 03/27/2025 at 02:16:50 PM (Central Daylight Time) Base City: OAK

Uploaded on: 03/27/2025 at 02:16:50 PM (Central Daylight Time) Base City: OAK

**Privacy Act Statement****Authority:**

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

**Purpose:**

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

**Routine Uses:**

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/oip/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

**Disclosure:**

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

Uploaded on: 03/27/2025 at 02:16:50 PM (Central Daylight Time) Base City: OAK

U.S. Department of Homeland Security

Continuation Page for Form I-862

Alien's Name OZTURK, RUMEYSA	File Number [REDACTED]	Date 03/25/2025
Event No: [REDACTED]		

**CURRENTLY RESIDING AT:**

South Louisiana Imm Center 3843 W Stagg Ave Basile, LOUISIANA 70515

Signature [REDACTED]	[REDACTED]	Title SDDO
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4 of 4 Pages

EXHIBIT

18

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. [REDACTED]

Date: 03/22/2025

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that OZTURK, RUMEYSA is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

(Signature of Authorized Immigration Officer)

(Printed Name and Title of Authorized Immigration Officer)

## Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at St. Albans, VT (Location)

on OZTURK, RUMEYSA on March 25, 2025, and the contents of this (Name of Alien) (Date of Service)

notice were read to him or her in the ENGLISH language. (Language)

Name and Signature of Officer

Name or Number of Interpreter (if applicable)

EXHIBIT

19

THE SECRETARY OF STATE  
WASHINGTONSENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

## MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio *gmr*

SUBJECT: (SBU) Notification of Removability Determinations under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 7, 2025, I have determined that Yunseo Chung (DOB: [REDACTED],  
POB: South Korea) and [REDACTED] [REDACTED] both U.S. Lawful Permanent Residents (LPRs), are deportable aliens under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against them, based on assurances from DHS/ICE/HSI.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that the activities and presence of these aliens in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest. These determinations are based on

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

Classified by: Secretary of State Marco Rubio  
E.O. 13526, Reason(s): 1.4 (justification sections);  
Declassify on 06 APR 2044, YYYY

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

information provided by the DHS/ICE/HSI regarding the participation and roles of Chung and [REDACTED] in antisemitic protests and disruptive activities, which fosters a hostile environment for Jewish students in the United States. My determination for Yunseo is also based on her citations for unlawful activity during these protests. The public actions and continued presence of Chung and [REDACTED] in the United States undermine U.S. policy to combat anti-Semitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and violence in the United States. Consistent with E.O. 14150, America First Policy Directive to the Secretary of State, the foreign policy of the United States champions core American interests and American citizens and condoning anti-Semitic conduct and disruptive protests in the United States would severely undermine that significant foreign policy objective.

#### Attachments

- Tab 1 – DHS Letter on Yunseo Chung
- Tab 2 – HSI Subject Profile of Yunseo Chung
- Tab 3 – DHS Letter on [REDACTED]
- Tab 5 – HSI Subject Profile of [REDACTED]
- Tab 5 – 8 USC 1227(a)(4)(C)

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE  
AAUP C A R 042

EXHIBIT

20

U.S. DEPARTMENT OF HOMELAND SECURITY

Warrant for Arrest of Alien

File No. [REDACTED]

Date: March 08, 2025

**To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations**

I have determined that there is probable cause to believe that CHUNG, Yunseo is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

**YOU ARE COMMANDED** to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

[REDACTED]  
(Signature of Authorized Immigration Officer)

[REDACTED]  
(Printed Name and Title of Authorized Immigration Officer)

**Certificate of Service**

I hereby certify that the Warrant for Arrest of Alien was served by me at \_\_\_\_\_  
(Location)

on \_\_\_\_\_ on \_\_\_\_\_, and the contents of this  
(Name of Alien) (Date of Service)

notice were read to him or her in the \_\_\_\_\_ language.  
(Language)

Name and Signature of Officer

Name or Number of Interpreter (if applicable)

EXHIBIT

21SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

## MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio

SUBJECT: (SBU) Determination of Deportability under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 14, 2025, I have determined that Badar Khan SURI (DOB: [REDACTED]; [REDACTED]; POB: India), an alien currently in the U.S. in nonimmigrant status as a research scholar, is a deportable alien under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against him, based on assurances from DHS/ICE/HSI.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that the activities and presence of these aliens in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest. These determinations are based on the assessment and conclusion provided by DHS/ICE/his, to which we defer

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

-2-

as DHS/ICE is the principal investigative unit of DHS, that that “Suri’s direct connection to Hamas leadership and involvement in antisemitic activities ...[creates] a hostile environment for Jewish students and [indicates] support for a designated terrorist organization.” In addition, DHS/ICE/HSI also assesses that Suri is “actively supporting Hamas terrorism” and “actively spreads its propaganda and promotes antisemitism on social media.” The activities and presence of Suri in the United States undermines U.S. policy to combat antisemitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and intimidation in the United States. Under E.O. 14188, Additional Measures to Combat Anti-Semitism, it is the policy of the United States to combat antisemitism, using all available and appropriate legal tools to hold to account the perpetrators of unlawful anti-Semitic harassment and violence. Consistent with E.O. 14150, America First Policy Directive to the Secretary of State, the foreign policy of the United States champions core American interests and American citizens and condoning antisemitic conduct and disruptive protests in the United States would severely undermine that significant foreign policy objective. Moreover, the type of intimidation and incitement attributable to Suri potentially undermines the peace process underway in the Middle East by reinforcing anti-Semitic sentiment in the regional and thereby threatening the U.S. foreign policy goal of peacefully resolving the Gaza conflict.

(SBU) The Department of State also requests the opportunity to consult with the Department of Homeland Security on any public statements regarding this determination.

(SBU) I hereby expressly authorize use of this notification by the Department of Homeland Security in immigration court.

#### **Attachments**

- Tab 1 – DHS Letter on Badar Khan Suri
- Tab 2 – HSI Subject Profile of Badar Khan Suri
- Tab 3 – 8 USC 1227(a)(4)(C)

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AAUP C.A.R.045

Uploaded on: 03/18/2025 at 08:01:33 AM (Central Daylight Time) Base City: PIS

EXHIBIT

22

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

DOB: [REDACTED]

Event No.: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act.

Subject ID: [REDACTED]

File No.: [REDACTED]

In the Matter of:

Respondent: BADAR KHAN BURI

currently residing at:

[REDACTED] (Number, street, city, state and ZIP code)

[REDACTED] (Area code and phone number)

You are an arriving alien.

You are an alien present in the United States who has not been admitted or paroled.

You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of INDIA and a citizen of INDIA;
3. You were admitted to the United States at Dulles, VA, on December 10, 2022 as a Exchange Visitor;
4. On March 15, 2025, The Secretary of State has determined that your presence or activities in the United States would have serious adverse foreign policy consequences for the United States.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, as amended, in that the Secretary of State has reasonable ground to believe that your presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

27931 BURNA VISTA BLVD, LOS PRESEOS, TEXAS 78564, PRATERLAND DETENTION CENTER  
(Complete Address of Immigration Court, including Room Number, if any)

ON May 6, 2025 at 8:30 am to show why you should not be removed from the United States based on the  
(Date) (Time) charge(s) set forth above.

CHRISTOPHER R.  
HECK

(Signature and Title of Issuing Officer)

Date: March 17, 2025

Chantilly, VA

(City and State)

Uploaded on: 03/18/2025 at 08:01:33 AM (Central Daylight Time) Base City: PIS

**Notice to Respondent****Warning:** Any statement you make may be used against you in removal proceedings.**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.**One-Year Asylum Application Deadline:** If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at [www.uscis.gov/I-589](http://www.uscis.gov/I-589). Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.**Failure to appear:** You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.**Mandatory Duty to Surrender for Removal:** If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.dhs.gov/contactUs>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.**U.S. Citizenship Claims:** If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-8903.**Sensitive locations:** To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.**Request for Prompt Hearing**

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

**Before:**

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

**Certificate of Service**This Notice To Appear was served on the respondent by me on March 17, 2025, in the following manner and in compliance with section 239(a)(1) of the Act.

In person    by certified mail, returned receipt # \_\_\_\_\_ requested    by regular mail  
 Attached is a credible fear worksheet.  
 Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the ENGLISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.REFUSED

(Signature of Respondent if Personally Served)

Uploaded on: 03/18/2025 at 08:01:33 AM (Central Daylight Time) Base City: PIS

Allegations: Denies All; |

#### Privacy Act Statement

##### Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

##### Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

##### Routine Use:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORNs): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/ocfo/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

##### Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

TO  
DOJ  
EOIR

Case 1:25-cv-10685-WGY Document 130 Filed 06/11/25 Page 1 of 5

**EXHIBIT**

**23**

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.

Defendants.

Case No. 1:25-cv-10685 (WGY)

**STIPULATION AND PROPOSED ORDER**

WHEREAS, Plaintiffs American Association of University Professors, American Association of University Professors-Harvard Faculty Chapter, American Association of University Professors at New York University, Rutgers American Association of University Professors-American Federation of Teachers, and Middle East Studies Association ("Plaintiffs"), by and through their undersigned counsel, and Defendants Marco Rubio, Kristi Noem, Todd Lyons, and Donald J. Trump ("Defendants") have stipulated and agreed that all statements made by government officials and agents, and quotes attributed to them, in the following documents are authenticated pursuant to Federal Rule of Evidence 901:<sup>1</sup>

1. Secretary of State Marco Rubio's March 6, 2025 post on X (available at <https://perma.cc/KD9R-BNV3>);
2. Department of Homeland Security's March 9, 2025 post on X (available at <https://perma.cc/3NNO-235L>);

<sup>1</sup> Defendants do not waive hearsay objections to any statements other than those by government officials and agents stipulated to in this document.

3. Secretary of State Marco Rubio's March 9, 2025 post on X (available at <https://perma.cc/Q7EH-M4LW>);
4. President Donald J. Trump's March 10, 2025 post on Truth Social (available at <https://perma.cc/Z5PU-7MZT>);
5. White House Press Secretary Karoline Leavitt's March 11, 2025 Press Briefing transcript (available at <https://perma.cc/XAJ6-N2CD>);
6. Secretary of State Marco Rubio's March 12, 2025 remarks to the press in Shannon, Ireland (available at <https://www.state.gov/secretary-of-state-marco-rubio-remarks-to-press/>);
7. Deputy Secretary of Homeland Security Tony Edgar's March 13, 2025 interview with NPR (available at <https://perma.cc/Q45C-6B9A>);
8. Vice President J.D. Vance's March 13, 2025 Fox News Interview Transcript (available at [Dkt. No. 14-18](#));
9. The March 14, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/7YAG-38XF>);
10. Secretary of State Mark Rubio's March 16, 2025 interview on CBS's Face the Nation (available at <https://perma.cc/DV8P-2CWZ>);
11. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's March 19, 2025 post on X (available at <https://perma.cc/JE82-K8CM>);
12. Secretary of State Marco Rubio's March 27, 2025 remarks during a Joint Press Availability with Guyanese President Irfaan Ali (available at <https://perma.cc/8LC9-S86R>);
13. Secretary of State Marco Rubio's March 28, 2025 remarks to the press (available at <https://perma.cc/5YPB-GBGX>);

14. Secretary of State Marco Rubio's April 8, 2025 interview on Triggered with Don Jr. (available at <https://perma.cc/6RD7-S8DN>);
15. The April 9, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/ZSM5-X5GE>);
16. White House Deputy Chief of Staff Stephen Miller's April 14, 2025 interview with Fox News (available at <https://bsky.app/profile/atrupar.com/post/3lmroi5yzz723>);
17. Secretary of State Marco Rubio's April 17, 2025 interview on the Ben Shapiro Show (available at <https://perma.cc/K92W-A4XN>);
18. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's April 30, 2025 post on X (available at <https://perma.cc/T6JE-3H9Y>);
19. The May 7, 2025 NPR article quoting Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin (available at <https://perma.cc/U9JK-Q75Z>);
20. Secretary of State Marco Rubio's May 7, 2025 post on X (available at <https://perma.cc/RNB6-YUUH>);
21. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's May 8, 2025 post on X (available at <https://perma.cc/TA4V-8HDP>);
22. The January 30, 2025 White House Fact Sheet Titled "Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism" (available at <https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-forceful-and-unprecedented-steps-to-combat-anti-semitism/>).

Case 1:25-cv-10685-WGY Document 130 Filed 06/11/25 Page 4 of 5

Dated: New York, New York  
June 9, 2025



Michael Tremonte  
Noam Biale  
Alexandra Conlon  
Courtney Gans  
90 Broad Street, 23rd Floor  
New York, New York 10004  
(212) 202-2603  
mtremonte@shertremonte.com  
nbiale@shertremonte.com

Ramya Krishnan  
Carrie DeCell  
Xiangnong Wang  
Talya Nevins  
Jackson Busch  
Scott Wilkens  
Alex Abdo  
Jameel Jaffer  
Knight First Amendment Institute  
at Columbia University  
475 Riverside Drive, Suite 302  
New York, NY 10115  
(646) 745-8500  
ramya.krishnan@knightcolumbia.org

Ahilan T. Arulanantham  
Professor from Practice  
UCLA School of Law  
385 Charles E. Young Dr. East  
Los Angeles, CA 90095  
(310) 825-1029  
arulanantham@law.ucla.edu

Edwina Clarke, BBO 699702  
130 Bishop Allen Drive  
Cambridge, MA 02139  
(617) 676-9423  
edwina@zimmmercitonclarke.com

*Attorneys for Plaintiffs*

YAAKOV M. ROTH  
*Acting Assistant Attorney General*  
DREW C. ENSIGN  
*Deputy Assistant Attorney General*  
LEAH B. FOLEY  
*United States Attorney*  
SHAWNA YEN  
*Assistant United States Attorney*  
*District of Massachusetts*

WILLIAM KANELLIS  
*Trial Attorney*

ANTHONY NICASTRO  
*Acting Director*

*/s/ Ethan B. Kanter*

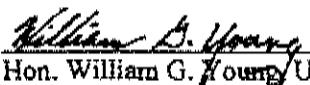
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ETHAN B. KANTER,  
Chief, National Security Unit  
Office of Immigration Litigation  
Civil Division, U.S. Department of Justice  
P.O. 878, Ben Franklin Station  
Washington, DC 20044  
(202) 616-9123  
ethan.kanter@usdoj.gov

*Attorneys for Defendants*

Case 1:25-cv-10685-WGY Document 130 Filed 06/11/25 Page 5 of 5

SO ORDERED

  
Hon. William G. Young U.S. District Judge

EXHIBIT

**24**

Secretary Marco Rubio        

@Sec\_Rubio

Those who support designated terrorist organizations, including Hamas, threaten our national security. The United States has zero tolerance for foreign visitors who support terrorists. Violators of U.S. law — including international students — face visa denial or revocation, and deportation.

EXIB

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Homelar

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On March 9, 2025, in support of President Trump's executive orders prohibiting anti-Semitism, and in coordination with the Department of State, U.S. Immigration and Customs Enforcement arrested Mahmoud Khalil, a former Columbia University graduate student. Khalil led activities aligned to Hamas, a designated terrorist organization.

DHS and the Department of State are committed to enforcing President Trump's executive orders and to protecting U.S. national security.

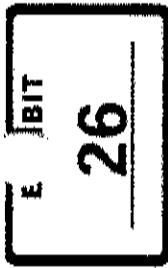
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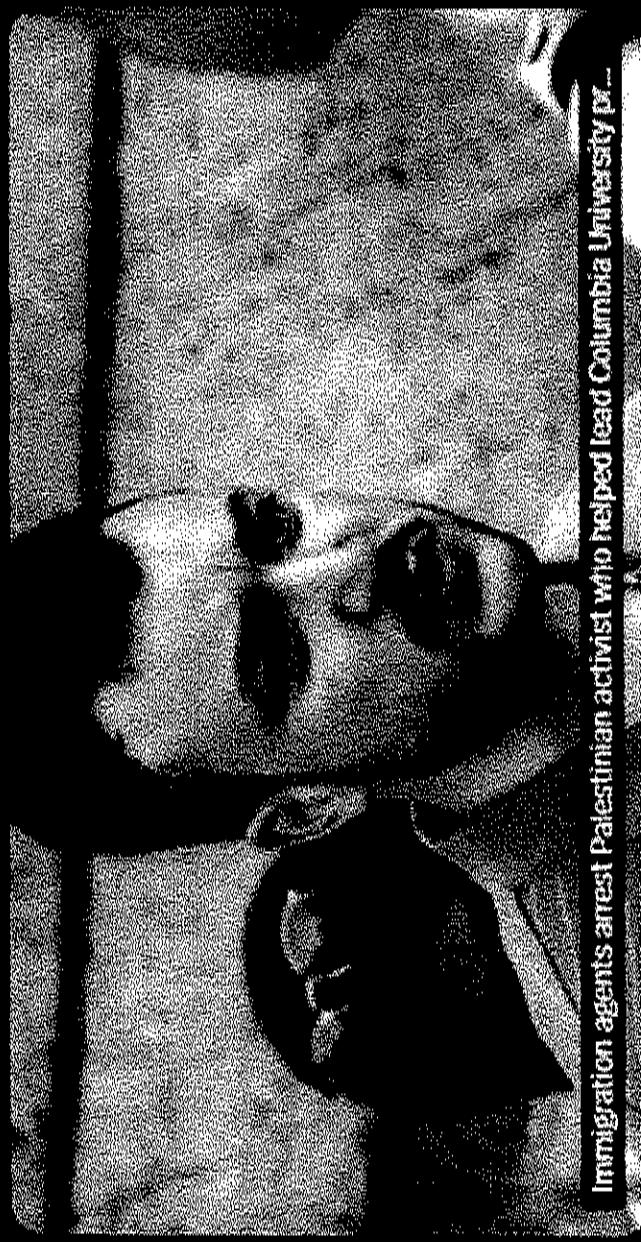
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— 1 —



We will be revoking the visas and/or green cards of Hamas supporters in America so they can be deported



Immigration agents arrest Palestinian activist who helped lead Columbia University pr...

19.5%

EXHIBIT

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Donald J. Trump @realDonaldTrump

Following my previously signed Executive Orders, ICE proudly apprehended and detained Mahmoud Khalil, a Radical Foreign Pro-Hamas Student on the campus of Columbia University. This is the first arrest of many to come. We know there are more students at Columbia and other Universities across the Country who have engaged in pro-terrorist, anti-Semitic, anti-American activity, and the Trump Administration will not tolerate it. Many are not students, they are paid agitators. We will find, apprehend, and deport these terrorist sympathizers from our country — never to return again. If you support terrorism, including the slaughtering of innocent men, women, and children, your presence is contrary to our national and foreign policy interests, and you are not welcome here. We expect every one of America's Colleges and Universities to comply. Thank you!

11.3k Retweets 49.9k Likes

Mar 10, 2025, 1:05 PM

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7/3/25, 9:51 PM

Roll Call Factbase - Press Briefing: Karoline Leavitt Holds a Press Briefing at The White House - March 11, 2025

Roll Call



Factbase

Powered by FiscalNote StressLens

Donald J. Trump

Transcripts    White House Correspondents    White House Press Briefings

## Press Briefing: Karoline Leavitt Holds a Press Briefing at The White House - March 11, 2025

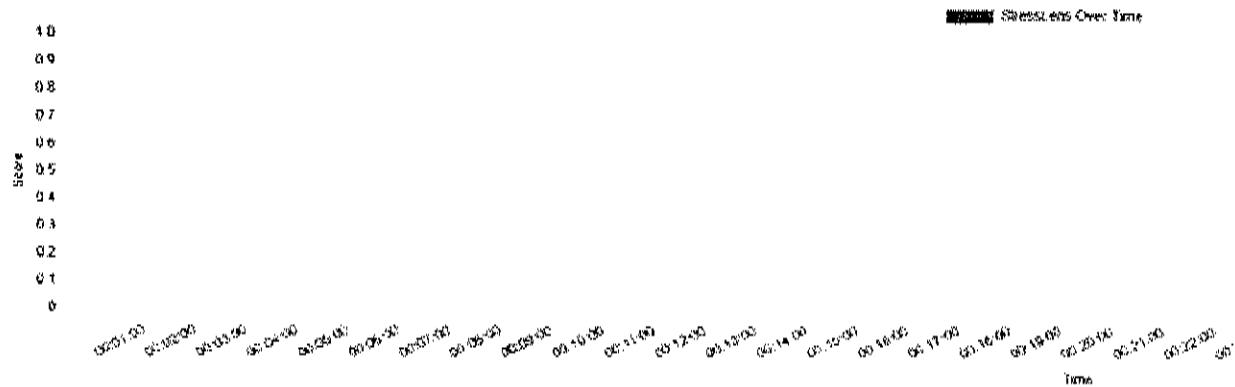
StressLens

6 Topics

10 Crashes

1 Moderator

2 Speakers



Full Transcript

▶ Karoline Leavitt 00:00:30 10:00:00 (cont.)

[NO STRESSLENS]

X

How are you?

▶ Question 00:00:30 10:00:00 (cont.)

Guest

EXHIBIT

28

7/3/25, 9:51 PM

Roll Call Factbase - Press Briefing: Karoline Leavitt Holds a Press Briefing at The White House - March 11, 2025

Karoline Leavitt (09:51:00-09:51:10 sec)

[NO SIGNAL 0]

X

Good. I'd let my staff get settled. Uh, there's a lot of news today, so I look forward to taking your questions. Good to see you, Mr. and I have some updates for you as well. Later today, President Trump will address the business roundtable's quarterly meeting where he will tout his pro-growth economic agenda and answer questions before more than 100 of our nation's leading CEOs. In fact, it's the largest attendance ever for this event because business leaders are so eager and encouraged by President Trump's return to Washington.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

This follows President Trump's roundtable yesterday with the technology FEC Council here at the White House, where he met with key leaders in the technology industry. And last night, President Trump also held an official swearing-in ceremony in the Oval Office for Sean Cavanagh, who is now the 26th Director of the United States Secret Service.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

Sean demonstrated unbelievable bravery under gunfire in Butler, Pennsylvania this past July when an assassin tried to kill President Trump. As someone who got to know Sean personally throughout the campaign last year, I can say unequivocally that there is nobody better suited for this important role. And following the confirmation of Labor Secretary Tom Perez. On Friday last night, the Senate has now confirmed 23 of President Trump's well-qualified cabinet level nominees for ratifying the previous administration.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

And looking ahead, tomorrow, the president will welcome the FaceBook Michael Marin, of Facebook for the annual White House - White House Shamrock ceremony. And Thursday, President Trump will welcome the NATO secretary general for a working meeting and lunch. On the economy, February's jobs report was good news for America, particularly our manufacturing sector.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

The manufacturing sector gained 10,000 new jobs in just one month under President Trump. This rebound was led by the automobile sector where we saw 9,000 new auto jobs created already. That is the most auto jobs added to the economy in 10 months. This was a complete turnaround from the Biden administration where we were losing an average of 9000 manufacturing jobs per month last year.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

Reuters is out with a report that a number of companies are now looking at expanding their presence or bringing their businesses into America because of President Trump's policies. And just moments ago, before coming out here, I saw another report by Reuters revealing that Merck has opened a \$1 billion facility at its North Carolina site.

Karoline Leavitt (09:51:09-09:51:10 sec)

[NO SIGNAL 0]

This is just the latest pharmaceutical company to boost its US manufacturing in light of President Trump's tariff. The announcement follows Eli Lilly's plan to invest at least \$27 billion to build four new manufacturing plants here in the United States. And Pfizer has also said it's considering moving their manufacturing overseas right here to the United States of America.

X

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7/25, 9:51 PM

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Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

X

As the president has said over and over again, when we purchase products made in the USA, the profits stay here, the revenue stays here and most importantly, the jobs stay here. And despite the globalist mainstream media's attempts to worry consumers, President Trump will not repeat the trend of past American presidents who broke their promises to the American public and instead while they stuck a knife in the back of American workers and shipped their jobs overseas.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

Our country has lost more than 5 million jobs in more than 90,000 factories due to devastating globalization over the last three decades alone. North Carolina lost 300,000 manufacturing jobs, including 60 percent of all furniture manufacturing jobs in the years following NAFTA. And in Michigan, globalist policies destroyed 250,000 jobs, including 40 percent of the auto industry.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

Which again, we know is clawing back because of President Trump's action already. These are harrowing statistics that represent countless towns and families who have been completely destroyed. But the America first globalists era is ending under President Trump. He will no longer allow our country and our workers, our hardworking American families to be ripped off.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

On another very important issue for the president, he continues to work hard to secure the border. If you missed it yesterday, CBP launched an enhanced home mobile app with a new feature, the Intent to Depart, which offers unlawfully present aliens on those aliens whose parole has been revoked an orderly and defined process to notify the US government of their intent to depart the country.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

The CBP home app strengthens our mission to secure the border and provides illegal aliens with a straightforward way to leave now before facing much harsher consequences later. A new report from Bloomberg just found that the number of aliens trying to reach our country by traversing through the jungle to Central America dropped a whopping 99 percent last month.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

And this follows the incredible news that illegal border crossings plummeted last month as well, down 94 percent at our southern border from last February under the Biden administration. As President Trump made clear during his historic address to Congress, we must finish this job and continue to carry out the largest deportation campaign in American history.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

And that is why the president fully endorses the continuing resolution that is before Congress and was negotiated by Speaker Johnson, in encouraging all Republicans to vote yes on this clean CR, which freezes funding at current levels and will prevent the Democrats from getting their long-awaited government shutdown.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

X

Voting against this CR will hurt the American people and kill the incredible momentum that President Trump has built over the past 54 days. And lastly, before I take questions, I would like to commend The Washington Post, who I believe is in the room today. According to a new report from Axios, The Washington Post is overhauling their newsroom structure.

Karoline Leavitt - 03/11/2025, 09:51 AM

[NO SIGNAL]

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X

It appears that the mainstream media, including the host is finally learning that having disdain for more than half of the country who supports this president does not help you sell newspapers. It's not a very good business model. And that's why we have people in our new media space. And today, we have Sarah Annette, who is the host of Breaking Points a popular political YouTube news and podcast show that has racked up nearly 1 billion views on YouTube, several hundred million podcast downloads since its launch in June 2021. She's also a former member of the White House Correspondents Association, but is now a part of the thriving independent media.

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

We're very happy to have you with us here today. Why don't you kick off our briefing? thank you.

Question (00:00:00:00:00:00)

[NO SIGNAL 0]

Really, really appreciate you having me. Karoline, a couple of questions for you. I may. First off on the stock market. So currently it's the 25th anniversary today of the dot-com bubble crash. There's a lot of concern for a lot of Americans right now about the state of the economy. President Trump has refused to rule out a recession.

Question (00:00:00:00:00:00)

[NO SIGNAL 0]

Secretary Lutnick, however, has told us there will not be one. So can the White House just tell and assure Americans today that there's not going to be a recession?

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

Well, there's a lot to unpack there. So, let me start by saying that first of all, when it comes to the stock market, the numbers that we see today, the numbers we saw yesterday, the numbers we'll see tomorrow are a snapshot of a moment in time. And as President Trump has said, and I'm here to echo the remarks of the president and of the White House, we are in a period of economic transition.

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

We are in a period of transition from the mess that was created under Joe Biden and the previous administration. Joe Biden left the country in an economic disaster. Several statistics to point out: the delinquency rate on credit card loans increased 62 percent under Joe Biden, hitting a near 12-year high.

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

Under Joe Biden, all net job growth went to foreign-born Americans. Real wages declined by 1.5 percent under Joe Biden. And as we all know, and the administration continues to combat, prices soared more than 20 percent under Joe Biden because of his reckless spending and economic policies. So, we are in a period of transition from that economic nightmare under a president who had no idea what he was doing, never held the private sector jobs in his life, into a golden age of American manufacturing under a businessman and a deal maker in chief in President Donald J. Trump who will be implementing, is implementing the formula that we know works.

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

Look at President Trump's results in his first term. If people are looking for certainty, they should look at the record of the president. That's why the American people relected him back to this office. And look at everything that President Trump has already done, and his team has already done in just 51 days.

Karoline Leavitt (00:00:00:00:00:00)

[NO SIGNAL 0]

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The massive efforts to deregulate, tax cuts, which we used congress to pass the Trump economic agenda, the Trump tax cuts, which will stimulate economic growth. And the president also addressed this directly I will point out as well, when you look at what he said on Air Force One, and he said he wants the American people to have so much money in their pockets, they don't even know what to do with it. That's the intent of this administration and we're working very hard every day on that goal.

▶ Question 01:01:16 01:19 W, 13 sec

[NO SIGNAL]

Second question on the CR. So, President Trump came out today in a primary challenge against Congressman Thomas Massie. Congressman Massie has been a supporter of DODGE, he's been a supporter of Make America Healthy Again. What kind of message is the White House sending against a congressman who's sticking up for principles that he's long held in the chamber and voting against continuing resolution and spending?

▶ Karoline Leavitt 01:01:20 01:31 01 sec

[NO SIGNAL]

I think the president has made it very clear that he believes it's crucial for conservatives and republicans and frankly all members of congress to get behind this continuing resolution to keep the government funded. The president wants to continue the momentum that he has built over the last 51 days, in order to keep the government funded, we've got to keep moving with these deportations and he believes that everybody needs to get on board with this big

▶ Karoline Leavitt 01:01:21 01:31 01 sec

[NO SIGNAL]

He's been active in this process. He's been making calls to get this over the finish line. And we're urging every republican and democrats too, to do what's right for the American public to prevent a government shutdown.

▶ Question 01:01:21 01:31 01 sec

[NO SIGNAL]

Just the last question here on Mahmoud Khalil. Does the administration believe that it needs to debar a green card holder with a claim to be eligible for deportation?

▶ Karoline Leavitt 01:01:22 01:42 01 sec

[NO SIGNAL]

Well, in fact, Secretary Rubio reserves the right to revoke the visa of Mahmoud Khalil. And I'm glad you brought this up. Under the Immigration and Nationality Act, the Secretary of State has the right to revoke a green card or a visa for individuals who serve or are adversarial to the foreign policy and national security interests of the United States of America.

▶ Karoline Leavitt 01:01:23 01:42 01 sec

[NO SIGNAL]

And Mahmoud Khalil was an individual who was given the privilege of coming to the country to study at one of our nation's finest universities and colleges. And he took advantage of that opportunity, of that privilege by serving with terrorist Hamas terrorists who have killed innocent men, women and children.

▶ Karoline Leavitt 01:01:24 01:42 01 sec

[NO SIGNAL]

This is an individual who organized group protests that not only disrupted college campus classes and harassed Jewish American students and made them feel unsafe on their own college campuses, but also distributed pro-Hamas propaganda fliers with the logo of Hamas. That's what the behavior and activity that this individual engaged in. And I have those fliers on my desk, they were provided to me by the Department of Homeland Security.

▶ Karoline Leavitt 01:01:25 01:42 01 sec

[NO SIGNAL]

I thought about bringing them into this briefing room to share with all of you, but I didn't think it was worth the dignity of the room to bring that pro-Hamas propaganda. But that's what the individual distributed on the campus of Columbia University.

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And the administration is not going to tolerate individuals having the privilege of studying in our country and then siding with pro-terror organizations that have killed Americans.

X

Karoline Leavitt 09:51:34 (ET) 06/25/25

NO SIGNAL (0)

We have a zero-tolerance policy for siding with terrorists, period. Peter Doocy.

Question 10:11:30 (ET) 06/25/25

NO SIGNAL (0)

Thank you, Karoline. So, you said that the Dow dropping and dropping and dropping is a *product of taxation*. You're sure nobody here at the White House shorted the Dow.

Karoline Leavitt 10:11:39 (ET) 06/25/25

NO SIGNAL (0)

(Laughter) No, I don't think so.

Question 10:11:49 (ET) 06/25/25

NO SIGNAL (0)

OK. But is there any concern here that it's going to be harder to ask certain federal workers to retire if they look at their retirement accounts and they're getting clobbered every day?

Karoline Leavitt 10:12:01 (ET) 06/25/25

NO SIGNAL (0)

Well, I'm glad you brought up workers because that's exactly who President Trump is looking out for with his America First trade policy and his America First economic agenda. And if you look at -- there's great indication to be optimistic about where the economy stands and the American people, investors, CEOs, small business owners, but most importantly workers, should look on President Trump, because his tariff policies, what he envisions is reciprocity -- fair trade practices where American workers are put first and are no longer ripped off by foreign countries all over this world.

Question 10:12:01 (ET) 06/25/25

NO SIGNAL (0)

President Trump says he's going to buy a Tesla today. Did he buy it? And when is the last time we drove a car?

Karoline Leavitt 10:12:06 (ET) 06/25/25

NO SIGNAL (0)

That's a very good question. I have heard the president remark that he misses being able to drive that luxury of driving his own vehicle, although the beast is nice. But he is going to be viewing a Tesla that is making its way to the White House complex now. I can confirm. Perhaps the press pool today will have an opportunity to witness this very exciting moment later this afternoon.

Karoline Leavitt 10:12:06 (ET) 06/25/25

NO SIGNAL (0)

But Tesla -- a Tesla is on its way here now and we'll see if the president likes it when he checks it out.

Question 10:12:06 (ET) 06/25/25

NO SIGNAL (0)

So, they're bringing him a Tesla to look at and if he likes it, he's just going to buy it.

Karoline Leavitt 10:12:06 (ET) 06/25/25

NO SIGNAL (0)

He's intent on -- he's definitely going to buy one. But he'll take a look at it when it gets here later this afternoon.

X

Question 10:12:06 (ET) 06/25/25

NO SIGNAL (0)

Full clobber" (i.e. right).

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Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

X

Yes, but market price. Kelly?

Question (03/11/2025, 09:51:00)

[NO SIGNAL]

Can we talk about Canada? What is the status of President Trump having a conversation with Mark Carney? We have seen the president use the term "goonie" to refer to Justin Trudeau, will that transfer also go to Mr. Carney going forward? And is the decision to increase the tariffs -- is that based on a specific economic metric that he looked at? Is it impulse?

Question (03/11/2025, 09:51:00)

[NO SIGNAL]

How would you describe his reaction to Canada?

Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

The president has not yet spoken to Mr. Carney, but since I checked, which was just moments ago, last weekend, his phone is always open to leaders who wish to speak with him. As for the tariff, the president made his position on this quite clear with the statement that he put out. And it was a retaliatory statement due to the escalation of rhetoric that we've seen out of Ottawa, Canada.

Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

The president saw the premier, Doug Ford, make an egregious and insulting comment threatening to shut down electricity for the American people for hard working American families. He made that threat. The president saw that and has an obligation and a responsibility to respond accordingly and represent the interests of the American people.

Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

So, he has made the decision to add a 25 percent tariff. So, now steel and aluminum tariffs will come into effect tomorrow at the rate of 25 percent. And our steel and aluminum industries have actually applauded these tariffs because, again, they know it's going to grow their industry here, it's going to allow them to export more steel. This is made right here in the United States with American workers.

Question (03/11/2025, 09:51:00)

[NO SIGNAL]

Egregious and insulting are your words here, but that's what many Canadian leaders have said about the actions President Trump has taken toward Canada. And what do you think the timeline is for speaking to Mr. Carney? Because normally the president -- a sitting president speaks to a close ally very quickly when there's new leadership.

Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

Well, the president is again responding to the fact that Canada has been imposing on the United States of America and hard-working Americans for decades. If you look at the rates of tariffs across the board that Canadians have been imposing on the American people and our workers here, it is egregious. In fact, I have a horstly, dandy chart here that shows not just Canada, but the rate of tariffs across the board.

Karoline Leavitt (03/11/2025, 09:51:00)

[NO SIGNAL]

X

If you look at Canada, since you brought it up, American cheese and butter, nearly 300 percent tariff, you look at India, 150 percent tariff on American alcohol. You think that's helping Kentucky bourbon to be exported into India? I don't think so. 100 percent tariff on agricultural products from India. Look at Japan, nothing over 100 percent.

[NO SIGNAL]

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▶ Karoline Leavitt (00:00:00.000-00:00:01.000)

[NO SIGNAL:0]

X

President Trump believes in reciprocity, and it is about dang time that we have a president who actually looks out for the interests of American businesses and workers. And all he's asking for at the end of the day are fair and balanced trade practices. And unfortunately, Canada has not been treating us very fairly at all over the past several decades.

▶ Karoline Leavitt (00:00:20.000-00:00:21.000)

[NO SIGNAL:0]

To the woman in the purple, because I saw you were making a face at my previous answer. So, what's going on? [laughter]

▶ Question (00:00:29.000-00:00:30.000)

[NO SIGNAL:0]

Well, actually I have a couple of questions. At the core of pro-Palestinian protests on college campuses and elsewhere is a demand to end the war in Gaza, a goal that this administration actually supports and has pursued. So, why has this not been acknowledged or highlighted even.

▶ Karoline Leavitt (00:01:17.000-00:01:18.000)

[NO SIGNAL:0]

Because these colleges and their protests have again put out Hamas propaganda. The flyers that have been distributed call for violence. The flyers that have been distributed have the logo of an organization that has held Americans hostage, that murdered innocent babies, that murdered men, women and children.

▶ Karoline Leavitt (00:01:40.000-00:01:41.000)

[NO SIGNAL:0]

They are a designated foreign terrorist organization. And we are not going to tolerate non-citizens, foreigners who come here, on a visa, engaging in such behavior, siding with terrorists. And the Secretary of State reserves the authority to revoke the -- the green card or the visa of an individual who serves as a -- who -- actually it says right here, reasonable grounds to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences to the United States.

▶ Karoline Leavitt (00:01:44.000-00:01:45.000)

[NO SIGNAL:0]

And I think siding with Hamas makes that quite clear. Secretary Pompeo exercised that authority, and we fully believe that we are going to move forward with more arrests as President Trump previewed in his statement yesterday.

▶ Question (00:02:00.000-00:02:01.000)

[NO STRESS/0]

Yeah, but the White House also

▶ Karoline Leavitt (00:02:07.000-00:02:08.000)

[NO STRESS/0]

Ed?

▶ Question (00:02:08.000-00:02:09.000)

[NO STRESS/0]

Yeah, thanks, Karoline.

▶ Karoline Leavitt (00:02:21.000-00:02:22.000)

[NO STRESS/0]

Go ahead.

▶ Question (00:02:27.000-00:02:28.000)

[NO SIGNAL:0]

So are these conversations between the administration and the Canadian going on over this tariff? Because the Ontario Premier says the next step is to cut off electricity to the US.

[NO SIGNAL:0]

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Karoline Leavitt 00:15:27 00:15:32 (0 sec)

[NO SIGNAL (0)]

X

And the president put out a statement after seeing those comments. And said that it would be -- there would be grave consequences imposed on Canada if they think about shutting off electricity for the United States of America and our citizens. And the president is also determined to ensure that we are depending on American electricity, not the electricity production of foreign nations, including our allies in Canada.

Karoline Leavitt 00:15:37 00:15:42 (0 sec)

[NO SIGNAL (0)]

As for conversations, there is continued correspondence between the president's team, particularly Secretary Lutnick and the Canadians as well.

Question 00:15:47 00:15:51 (0 sec)

[NO SIGNAL (0)]

And the market reaction, how do you -- how do you sell to the American people then after they're looking at what's happening in the markets this week and say that the tariff policy long term is something good?

Karoline Leavitt 00:15:57 00:15:42 (0 sec)

[NO SIGNAL (0)]

Well, just think about what the tariff policy long term will do for our country. I think many of us probably grew up in small towns. I know at least I did. And the main street in my small town looks a heck of a lot worse than it probably did decades ago before I was alive. At least my parents and grandparents tell me so. And I know many Americans feel that same way.

Karoline Leavitt 00:16:40 00:15:57 (0 sec)

[NO SIGNAL (0)]

What the president envisions for this country is for the United States of America to be a manufacturing superpower where there are American factories and businesses owned by Americans producing goods that we are exporting to the rest of the world. Those revenues will stay here, it will increase wages for people here in our great country.

Karoline Leavitt 00:16:45 00:15:57 (0 sec)

[NO SIGNAL (0)]

It will ensure our national security. And it will boost the morale of the American people to have thriving industries again. (From about Detroit, Michigan think about North Carolina, as I mentioned, that used to have a thriving furniture industry that no longer exists because of the globalist trade policies of previous and past administrations.)

Karoline Leavitt 00:16:57 00:15:57 (0 sec)

[NO SIGNAL (0)]

And the American people gave the president a tremendous opportunity to restore American greatness and restore our manufacturing dominance. And he's intent on doing just that, John?

Question 00:17:04 00:15:49 (0 sec)

[NO SIGNAL (0)]

Thanks, Karoline. Thanks a lot, Karoline. Two questions for you. First on the UK, you put up on the screen the president's message to Republicans to support this continuing resolution. Is there outreach to Democrats? Because what we've seen since the beginning of the fiscal year is that in order to get a continuing resolution, you need bipartisan support, and you need compromise.

Karoline Leavitt 00:17:48 00:15:54 (0 sec)

[NO SIGNAL (0)]

Well, right now, we are focused on House Republicans and on the House. Because that's the first step, as you know, John. And so, the president has engaged in correspondence with House Republicans, whipping votes and getting them to a yes, which I understand has been pretty successful this morning thus far.

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Karoline Leavitt 00:21:00:00 / 00:21:04:00

[NO SIGNAL (a)]

X

And so again, the president is encouraging Republicans especially, but again, as I said, all members of Congress to vote to continue funding this government so we can continue the business of the American people which elected President Trump to do.

Question 00:21:04:01 / 00:21:04:09

[NO SIGNAL (b)]

And then, on financial markets, we've seen this decline yesterday. We see it today, as well. It seems that the road on the president's policies is one in which they do not have confidence in his trade tariff policy. They do not have confidence in what the president said to Fox News over the weekend that he didn't rule out the idea of a recession.

Question 00:21:46:00 / 00:21:47:07

[NO SIGNAL (c)]

What is your read in terms of the decline that we've seen over the last week and a half in financial markets?

Karoline Leavitt 00:21:47:02 / 00:21:48:00

[NO SIGNAL (d)]

Well, I think there's actually a lot of reason to be confident. And many people do feel confident, just look at the nearly \$2 trillion in private investment that this President has secured. Look at the comments made by the CEO of Apple, one of the biggest companies in the world who said that he is bullish on the future of American innovation under the leadership of President Trump.

Karoline Leavitt 00:22:00:02 / 00:22:02:00

[NO SIGNAL (e)]

Look at CEO confidence. According to the Conference Board measure of CEO confidence in Q1 2025, under the leadership of this president, it jumped to its highest level in three years from cautious optimism to confident optimism. If you again look at the \$2 trillion in investments from some of the biggest companies in the world, look at the jobs report last Friday.

Karoline Leavitt 00:22:10:00 / 00:22:10:00

[NO SIGNAL (f)]

As I also cited in my opening remarks, Fox Business reported that Trump sees a manufacturing boom in first folds jobs report of his second term. Look at the auto jobs that have already poured back into America. We added 9000 new auto jobs. Those are sticky jobs. These are good paying jobs. That's 9000 American families who will now be able to live the American dream because of the policies of this administration.

Karoline Leavitt 00:22:19:00 / 00:22:20:00

[NO SIGNAL (g)]

You also look at small business optimism. The NFIB put out a report this morning, small business optimism continues to be far higher than it ever was under the previous administration. There's a lot of reason to be optimistic. And again, the American people, CEOs and people on Wall Street and on Main Street should be on this president.

Karoline Leavitt 00:23:00:00 / 00:23:00:00

[NO SIGNAL (h)]

He is a dealmaker. He is a businessman. And he's doing what's right for our country. He wants to restore wealth to the United States of America. Michael, good to see you.

Question 00:23:00:02 / 00:23:04:00

[NO SIGNAL (i)]

X

Hey, Karoline, thank you. Two questions if I may. Will the ... will the administration be providing any relief to states affected by the Ontario Power Strike?

Karoline Leavitt 00:23:34:00 / 00:23:39:00

[NO SIGNAL (j)]

X

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Well, the president has made it very clear that China would be very wise not to shut off electricity for the American people. And we hope that that does not happen. As for what would happen, if that does take place, I'll leave it to the president to make those decisions.

X

▶ Question (NO SIGNAL 10):

[NO SIGNAL 10]

And does President Trump share the Justice Department's concern over using egg prices and possible collusion of Big Egg? (Laughter)

▶ Karoline Leavitt (NO SIGNAL 10):

[NO SIGNAL 10]

Well, we definitely -- we definitely do share the concern of the American people when it comes to the price of eggs. However, just to news, the average cost of a dozen eggs is actually down since Secretary Perdue and President Trump announced their plan. It's down 5.4%. So that's good news on the cost of eggs.

▶ Karoline Leavitt (NO SIGNAL 10):

[NO SIGNAL 10]

And as we know, under the Biden administration, egg prices went up 27 percent. This is another example of an economic mess that President Trump inherited. And the Secretary of Agriculture and the president are focused on fixing it. Secretary Perdue put out a five point plan -- a four point plan rather to address this issue.

▶ Karoline Leavitt (NO SIGNAL 10):

[NO SIGNAL 10]

And she has been honest and realistic with the American people at the inauguration always. It will take about three to six months to get the egg supply back to where it should be. But she is focused and the administration is focused on doing that every day. Karen?

▶ Question (NO SIGNAL 10):

[NO SIGNAL 10]

Thanks, Karoline. Just back on the market, you said that what we're seeing this week right now in Wall Street is a snapshot of a moment in time, but does the president think he bears any responsibility for the turmoil in the stock market this week?

▶ Karoline Leavitt (NO SIGNAL 10):

[NO SIGNAL 10]

Look, the president is unwavering in his commitment to restore American manufacturing and global dominance. And I think he doubled down on that this morning with his new statement and the tariffs that will be implemented tomorrow on steel and aluminum.

▶ Question (NO SIGNAL 10):

[NO SIGNAL 10]

And he has, and recently he's not looking at the market. He said you can't really watch the stock -- the stock market, but all of the gains since Election Day have been erased in the S&P 500. At what point, how far do stocks have to fall before the president considers it a factor and changes course?

▶ Karoline Leavitt (NO SIGNAL 10):

[NO SIGNAL 10]

Again, as I just said, the president will look out for Wall Street and for Main Street, just like he did in his last term. And people on Wall Street and Main Street should bet on the president. He's doing what's right for the country. Nick, good to see you.

X

▶ Question (NO SIGNAL 10):

[NO SIGNAL 10]

Good to see you, too. Thank you, Karoline. So is the president prepared like what we saw with Congresswoman Maxine to pressure other Republican lawmakers into supporting this continuing resolution?

X-17-2025-105

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Karoline Leavitt 09:25:56 06/20/25 11:26am

[NO SIGNAL (0)]

X

Well, he is very much involved, engaged in this process. He's been making calls to lawmakers on Capitol Hill. And I think his statements against Congressman Massie speak for themselves. And I will let the president put out any additional statements if he chooses to. But he fully expects all House Republicans to vote for this continuing resolution.

Question 09:26:01 06/20/25 11:26am

[NO SIGNAL (0)]

And just a follow-up, can we start to anticipate seeing more of the president weighing in on upcoming 2026 races like we saw this morning?

Karoline Leavitt 09:26:13 06/20/25 11:26am

[NO SIGNAL (0)]

I'm not sure about that. I'm not even sure if I'm allowed to speak about that from this podium. I would check in with our outside political team for guidance on future races and the president's involvement there.

Question 09:26:41 06/20/25 11:26am

[NO SIGNAL (0)]

Thank you. I wanted to ask you about some comments Elon Musk made yesterday. He said that there is \$500 to \$700 billion in waste and fraud in entitlement spending. He called it, "the big one to eliminate." During this month, he also referred to Social Security as a Ponzi scheme. Should Americans expect changes, big changes to Social Security and Medicare?

Karoline Leavitt 09:27:05 06/20/25 11:26am

[NO SIGNAL (0)]

President Trump has been unequivocally clear on this. He is going to protect Social security and Medicare benefit and Medicaid for hard working Americans who paid into these entitlement programs and deserve these hard earned benefits. And unfortunately, the mainstream media has taken Mr. Musk out of context.

Karoline Leavitt 09:27:14 06/20/25 11:26am

[NO SIGNAL (0)]

I saw a Bloomberg headline that our team is wrong and it took Mr. Musk out of context. What he was specifically referring to cutting was the waste and the fraud and abuse that does exist in these programs. According to an IG report from the Social Security Administration, there's more than \$70 billion of fraud in the Social Security program alone that we know of. And so the president will continue to protect these programs for hard-working Americans.

Karoline Leavitt 09:27:44 06/20/25 11:26am

[NO SIGNAL (0)]

And actually, cutting the waste, fraud and abuse out of these programs will protect it for hard-working Americans.

Question 09:27:48 06/20/25 11:26am

[NO SIGNAL (0)]

But Karoline, respectfully -- he said around \$500 billion to \$700 billion, there was no evidence to claim that. And also if that is the case, that would represent more than a third of what Social Security paid out last year, maybe 20 percent of Social Security and Medicare combined.

Karoline Leavitt 09:28:13 06/20/25 11:26am

[NO SIGNAL (0)]

Again, if you read his full quote, he said we think, it's an estimate based on what he's seen. He's not saying definitively, he's saying that's what DOGE suspects and Parks. And that's exactly why DOGE was created, to ensure that we are investigating the fraudulent spending, the wasteful abuse across our federal government.

Karoline Leavitt 09:28:41 06/20/25 11:26am

[NO SIGNAL (0)]

7/3/26, 9:51 PM

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X

And I could remind everybody in the room that 77 percent of the American people support this effort by Elon Musk and DCRS to identify such waste, fraud and abuse. Go ahead, you're welcome.

Question - 00:00:11 (00:00:11 sec)

[NO SIGNAL 00:00:11 sec]

Thanks, Karoline, for doing this. If we could just step back for a second, when President Trump had addressed the SST, when he was on the campaign trail, his big push was on tax cuts. He's going to be today at his proposing tax hikes, in the form of tariffs, and I'm gonna ask.

Karoline Leavitt - 00:00:21 (00:00:21 sec)

[NO SIGNAL 00:00:21 sec]

Not true. He's not doing that.

Question - 00:00:30 (00:00:30 sec)

[NO SIGNAL 00:00:30 sec]

For why he's prioritizing that over the tax cuts.

Karoline Leavitt - 00:00:40 (00:00:40 sec)

[NO SIGNAL 00:00:40 sec]

He's actually not implementing tax hikes; tariffs are a tax hike on foreign countries that again have been ripping us off. Tariffs are a tax cut for the American people. And the president is a staunch advocate of tax cuts. As you know, he campaigned on no taxes on tips, no taxes on overtime, no taxes on Social Security benefits.

Karoline Leavitt - 00:00:50 (00:00:50 sec)

[NO SIGNAL 00:00:50 sec]

He is committed to all three of those things, and he expects Congress to pass them later this year.

Question - 00:00:57 (00:00:57 sec)

[NO SIGNAL 00:00:57 sec]

For sure, have you ever paid a tariff, because I have? They don't get charged on foreign companies; they get charged on the imports.

Karoline Leavitt - 00:00:58 (00:00:58 sec)

[NO SIGNAL 00:00:58 sec]

And ultimately when we have fair and balanced trade, which the American people have not seen in decades, all I said at the beginning, revenues will stay here, wages will go up and our country will be made wealthier again. And I think it's insulting that you are trying to test my knowledge of economics and the decisions that the president has made.

Karoline Leavitt - 00:00:59 (00:00:59 sec)

[NO SIGNAL 00:00:59 sec]

I now regret going a question to the Associated Press. May go ahead.

Question - 00:01:11 (00:01:11 sec)

[NO SIGNAL 00:01:11 sec]

Hey, Karoline, I have two that's OK. The first one was on Russia-Ukraine. I think Special Envoy Mike Wilkoff said yesterday that Zelensky apologized in his letter to Trump. Can you share any more about that letter and what else might be interesting from it that we don't know?

Karoline Leavitt - 00:01:21 (00:01:21 sec)

[NO SIGNAL 00:01:21 sec] X

Yes, the president did reference that letter, as you're saying, in his joint address to Congress, and I do have an update. As you know, Secretary of State Rubio and our National Security Advisor, Mike Venzke, have been negotiating with the Ukrainians today in Saudi. They will be providing a full account of that meeting very soon.

[NO SIGNAL 00:01:31 sec]

7/3/25, 9:51 PM

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Karoline Leavitt 06/02/2018 02:22 (EST)

[NO SIGNAL 0]

X

But I can assure you and everybody here and the American people that the news we've received from that meeting throughout the day and the president has been briefed on is positive. This meeting has been productive. I will let Secretary Rubio and our national security - Secretary of State Rubio and our national security advisor speak to the specifics of what has been planned today when they are ready to do so when the meeting concludes.

Karoline Leavitt 10/11/2018 02:22 (EST)

[NO SIGNAL 0]

Today go ahead.

Question 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

Thank you, Karoline. According to Mahmoud Shadi, the president has said this is the first of many arrests like this. Does the administration have a rough estimate of how many arrests you're planning to make today?

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

I don't have an estimate. I do know that DHS, based on very good intel that they have gathered at the direction of the president's executive order, which made it very clear to the Department of Homeland Security that engaging, as I said, in anti-American, anti-Semitic, pro-Hamas protests will not be tolerated.

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

So, since the president signed that executive order, and once Secretary Nielsen has taken the oath at DHS, they have been using intelligence to identify individuals on our nation's colleges and universities, on our college campuses who have engaged in such behavior and activity, and especially illegal activity.

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

And so I don't have a readout on how many arrests will come, but I do know that DHS is actively working on it. And I also know that Columbia University has been given the names of other individuals who have engaged in pro-Turkish activity, and they are refusing to help DHS identify those individuals on campus.

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

And as the president said very strongly in his statement yesterday, he is not going to tolerate that. And we expect all America's colleges and universities to comply with this administration's policy. Ismino?

Question 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

Thank you so much, Karoline, for the question. On Canada, after all of these threats to increase tariffs or turn off electricity, I wonder, does the administration still consider Canada to be a close ally of the United States?

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

Well I think Canada is a neighbor, they are a partner. They have always been on ally, perhaps they are becoming a competitor now. But as the president also said on his forth social post today, he believes that Canadians would benefit greatly from becoming the 51st state of the United States of America.

Karoline Leavitt 03/11/2018 02:22 (EST)

[NO SIGNAL 0]

And I actually looked into some of the research about the cost of living in Canada, and the cost of living is much higher than it is here in the United States of America. The average cost of a home in Canada is much higher. In Quebec, the highest tax rate

7/3/25, 9:51 PM

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for an income of \$50,000 or more is 23.3 percent, more than half of Canadians incomes they are being taxed on. So, the president has made it clear that he believes Canadians would be better off not in our ally militarily if they were to become the 51st state of the United States of America.

X

Karoline Leavitt (to FNC 10:00:11:00)

[NO SIGNAL (0)]

Response:

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

Thank you, Karoline. A week ago, Attorney General Barr said a trove of Epstein files had been delivered to her office from the SONY. When can we expect those files to be released to the public?

Karoline Leavitt (to FNC 10:00:11:00)

[NO SIGNAL (0)]

I would defer you to the Department of Justice. I don't have a timeline here.

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

Do you have any update on the EX-Block?

Karoline Leavitt (to FNC 09:59:58:00)

[NO SIGNAL (0)]

I don't. At this moment, again, I would defer you to our DNI Director, Mike Pompeo, and also the Department of Justice. I know that they are working on that diligently as the president requested them to do. (Christian)

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

Thanks, Karoline. Two questions, since we've been talking a lot about tariff. Have there been any updates on standing up the External Revenue Service to collect revenue from that?

Karoline Leavitt (to FNC 10:00:11:00)

[NO SIGNAL (0)]

Well, we need reciprocal tariffs to go into effect first and, as you know, the president will be rolling those out on April 2nd. And then the next part of that process is collecting that revenue to ultimately create the External Revenue Service, which Secretary Lutnick is working very hard on and is quite enthusiastic about, if you have noticed from his media interviews.

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

Can the president do that through executive action, or will it require legislation?

Karoline Leavitt (to FNC 10:00:11:00)

[NO SIGNAL (0)]

Well, the president already signed an executive order to direct the secretary of commerce to establish the External Revenue Service or at least to identify ways in which it can be done. I would refer you to the Department of Commerce for more on specifics on that. Sure, in the back.

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

Thank you very much, Karoline. I have a few questions on South Korea and North Korea. First question, as you know, South Korean President Moon has been released from illegal detention. What is the reaction of the United States as an ally? Is there a possibility of a summit with President Trump when President Moon returns?

X

Question (09:59:58:00) (01:00)

[NO SIGNAL (0)]

[NO SIGNAL (0)]

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Second question on North Korea. North Korea launched the ballistic missile -- several ballistic missiles into the West Coast yesterday. What is the White House's reaction on this --

X

▶ Note: 09:51:42 202507031050

[NO STRESSERS]

▶ Crosstalk:

▶ Karoline Leavitt: 09:51:46 202507031050

[NO SIGNAL (0)]

Sure, yes. I'll start with your question on North Korea. We condemn these actions, and we call on North Korea to stop their unlawful and destabilizing actions. As for South Korea, the US and Republic of Korea's alliance is ironclad, and the Trump administration remains in close contact with our South Korean counterparts as we work together to promote a free and open Indo-Pacific.

▶ Karoline Leavitt: 09:51:54 202507031050

[NO STRESSERS]

▶ Sure.

▶ Question: 09:51:59 202507031050

[NO SIGNAL (0)]

The first question, you didn't answer that. But release of our South Korean president from jail [incredible]

▶ Karoline Leavitt: 09:52:04 202507031050

[NO SIGNAL (0)]

I don't have anything on that, but I can certainly check in with the National Security Council and get back to you. Sure, good to see you.

▶ Question: 09:52:15 202507031050

[NO SIGNAL (0)]

Press secretary, many are concerned about the validity of President Biden's official actions and also his pardons of the possible criminal actions of individuals, such as his family members and Liz Cheney as information is emerging that many of his official actions were auto-signed, possibly even the pardons and without his knowledge or consent.

▶ Question: 09:52:34 202507031050

[NO SIGNAL (0)]

Does the White House have any information available currently that Biden was actually the one that approved and signed those pardons? And second question, will the DOJ investigate whether President Biden's cognitive decline allowed unvetted staff to push through radical policy and pardons without his knowing approval?

▶ Karoline Leavitt: 09:52:51 202507031050

[NO SIGNAL (0)]

I don't know the answer to that question, but I can check in with our folks here who may know the answer to that question and get back to you. Please, go ahead.

▶ Question: 09:53:08 202507031050

[NO SIGNAL (0)]

Karoline, you did a great job articulating the vision that President Trump has for what his family -- he believes his family can do in terms of bringing jobs back to the United States. I asked you last week about how much Americans might need to buckle up for some short-term pain. A conversation that the President and Treasury Secretary Scott Bessent have had with the people

X

▶ Question: 09:53:16 202507031050

[NO SIGNAL (0)]

I'm wondering what is the -- how high is the pain threshold for President Trump and for the White House as you watch some of the turbulence in the stock markets as the [redacted] concerns from businesses that potentially see some of those approval ratings

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drop in the short term? How much is he willing to stomach that and will he stay committed to his vision for energy even as all of this comes up?

X

Karoline Leavitt [03/11/2025 09:51:00](#)

[NO SIGNAL -0]

Well, the president has been working hard every single day to alleviate the pain that was inflicted by the previous administration through massive deregulation through drill, baby, drill as we like to call it. Unleashing the might of our energy industry, which we know will ultimately drive down costs for consumers here at home.

Karoline Leavitt [03/11/2025 09:57:00](#)

[NO SIGNAL -0]

And again, as I mentioned, the president is intent on signing tax cuts for the American people to put more money back into their pockets which will ultimately unlock consumer confidence. And again, I'll reiterate the president is working尽他所能 as he does best. The president wants the American people to have so much more money in their pockets they don't know what to do with it. That's the goal of this administration through tariffs, through tax cuts, through deregulation and through unleashing the potential of our energy industry.

Karoline Leavitt [03/11/2025 10:11:00](#)

[NO SIGNAL -0]

I have two more quick notes before I wrap up. Um, April 28th, I can confirm that the Philadelphia Eagles will be here at the White House to celebrate their Super Bowl victory. I know there was a lot of fake news about an invitation that wasn't sent or wasn't sent. We want to correct the record. We sent an invitation.

Karoline Leavitt [03/11/2025 09:58:24:00](#)

[NO SIGNAL -0]

They enthusiastically accepted. And you will see them here on April 28th. And lastly, on a sad note, I would like to express our condolences to Fox News and to the entire Fox family who did lose a cornerstone, Craig Savage, who passed away at 61 years old recently. A very tragic death of an individual who was a great man and covered this building for many, many years.

Karoline Leavitt [03/11/2025 09:58:51:00](#)

[NO SIGNAL -0]

So the entire Press Office, the Communications Office have wants to express our condolences with the family and also with Fox News. And I'll see you guys later. Perhaps you'll see the president in a Tesla later this afternoon. Have a good one.

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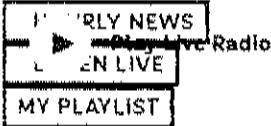
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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest : NPR



EXHIBIT

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## Interview highlights

# DHS official defends Mahmoud Khalil arrest, but offers few details on why it happened

MARCH 13, 2025 · 4:18 AM ET

HEARD ON MORNING EDITION

By Michel Martin, Destinee Adams

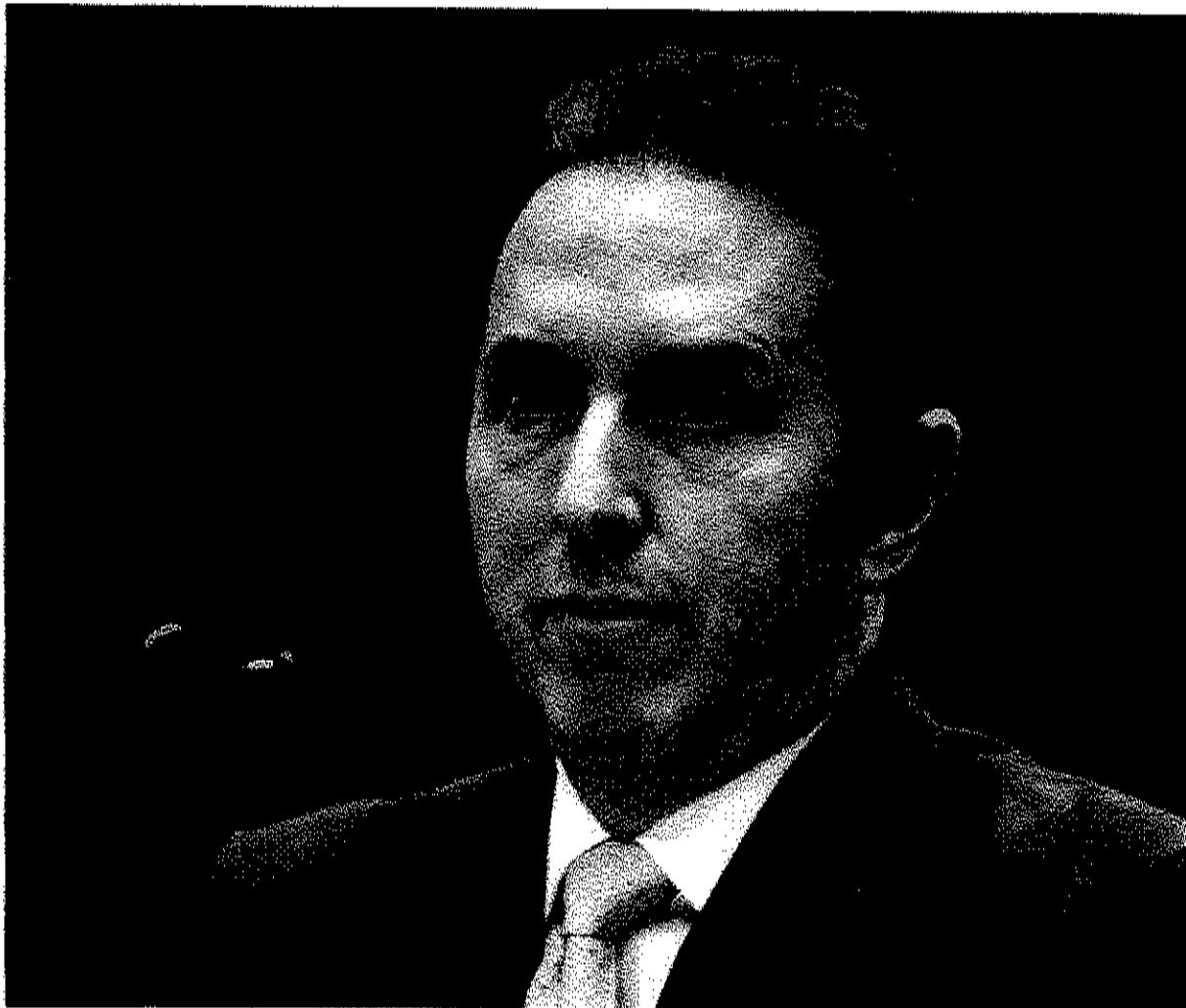
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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest: NPR



Troy Edgar testifies during his confirmation hearing before the Senate Homeland Security and Governmental Affairs Committee on February 25, 2025.

Chip Somodevilla/Getty Images

President Trump has ramped up efforts to deliver on a campaign promise to carry out the largest ever deportation of immigrants in U.S. history.

Parallel to those deportation plans is a crackdown on what the administration calls antisemitism on college campuses.

Both efforts came to the forefront this week when Immigration and Customs Enforcement officers arrested Mahmoud Khalil, a recent Columbia University graduate student, who has not been charged with any crime yet. This is likely the first high profile arrest of a legal permanent resident in connection with the pro-Palestinian protests that rippled across the nation's campuses last year. Trump has vowed that this is the first of many arrests to come as he lays a framework for

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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest : NPR

increased deportations. Trump officials are standing beside his efforts and doubling down on accusations that Khalil's actions align with those of a terrorist.

One of those officials is Troy Edgar, the deputy secretary of the Department of Homeland Security, who defended Khalil's arrest on *Morning Edition*. When NPR's Michel Martin asked him to explain what Khalil did to be arrested, aligned with terrorist activity and potentially deported, Edgar did not give a clear answer.

"I think you can see it on TV, right?" Edgar said. "We've invited and allowed the student to come into the country, and he's put himself in the middle of the process of basically pro-Palestinian activity. And at this point, like I said, the Secretary of State can review his visa process at any point and revoke it."

Khalil, a Syrian national of Palestinian descent, does not have a U.S. visa of any kind. Therefore an immigration judge would be the one to decide whether or not his status is revoked, not administration officials. He does however hold a green card, making him a lawful permanent resident in the U.S.

Khalil participated in pro-Palestine student protests at Columbia University last year, and he also negotiated with the administration on behalf of students pushing for the university to divest from Israel because of its war in Gaza against Hamas.

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After his arrest, Khalil was taken to a detention center in Louisiana. Though ICE officers said that his green card was revoked, U.S. District Judge Jesse M. Furman ordered he cannot be deported while the court weighs a legal challenge brought by his lawyers.

The day before Khalil's arrest, Edgar was sworn into his new position with the Department of Homeland Security. During Trump's first term, Edgar served as the department's chief financial officer.

Edgar spoke to Martin about Mahmoud Khalil's arrest and the Trump administration's ramped-up deportations of migrants.

*The following excerpt has been edited for length and clarity.*

### **Interview highlights**

**Michel Martin:** Mahmoud Khalil says he acted as a spokesperson for pro-Palestinian demonstrators and as a mediator with Columbia University, where he was a graduate student. As you know, Mr. Edgar, any conduct that can be legally sanctioned must be described. So, what is the specific conduct the government alleges that Mr. Khalil engaged in that merits removal from the United States.

**Troy Edgar:** I think what you saw there is you've got somebody that has come into the country on a visa. And as he's going through the visa process, he is coming in to basically be a student that is not going to be supporting terrorism. So, the issue is he was let into the country on this visa. He has been promoting this antisemitism activity at the university. And at this point, the State Department has

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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest : NPR

revoked his visa for supporting a terrorist type organization. And we're the enforcing agencies, so we've come in to basically arrest him.

**Martin:** A White House official told the Free Press that there's no allegation that he broke any laws. So, again, I have to ask, what specifically constitutes terrorist activity that he was supporting? What exactly do you say he did?

**Edgar:** Well, like I said, when you apply for a visa, you go through the process to be able to say that you're here on a student visa, that doesn't afford you all the rights of coming in and basically going through this process, agitating and supporting Hamas. So, at this point, yeah, the Secretary of State and the State Department maintains the right to revoke the visa, and that's what they've done.

**Martin:** How did he support Hamas? Exactly what did he do?

**Edgar:** Well, I think you can see it on TV, right? This is somebody that we've invited and allowed the student to come into the country, and he's put himself in the middle of the process of basically pro-Palestinian activity. And at this point, like I said, the Secretary of State can review his visa process at any point and revoke it.

**Martin:** He's a permanent resident. He's not a visa holder. He's a legal permanent resident. He has the green card, at least he did, until it's alleged that it was revoked.

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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest; NPR

If the allegation is that Mr. Khalil organized protests and made speeches after which other people engaged in prohibited activity, or, say, violent activity. Well, Mr. Trump gave a political speech on January 6, 2021, after which some individuals engaged in violent and illegal acts. How is this any different?

**Edgar:** President Trump's a citizen and the president of the United States. This is a person that came in under a visa. And again, the secretary of state at any point can take a look and evaluate that visa and decide if they want to revoke it.

**Martin:** He's a legal permanent resident. I have to keep insisting on that. He is a legal permanent resident.

So what is the standard? Is any criticism of the Israeli government a deportable offense?

**Edgar:** Like I said, I think that at this point when he entered into the country on a student visa, at any point we can go through and evaluate what his status is.

**Martin:** Is any criticism of the United States government a deportable offense?

**Edgar:** Like I said, if you go through the process and you're a student and you're here on a visa and you go through it, at any point ...

**Martin:** Is any criticism of the government a deportable offense?

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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest : NPR

**Edgar:** Let me put it this way, Michel, imagine if he came in and filled out the form and said, 'I want a student visa.' They asked him, 'What are you going to do here?' And he says, 'I'm going to go and protest.' We would have never let him into the country.

**Martin:** Is protesting a deportable offense?

**Edgar:** You're focused on protests. I'm focused on the visa process. He went through a legal process ...

**Martin:** Are you saying he lied on his application? He's a lawful permanent resident, married to an American citizen.

**Edgar:** I think if he would have declared he's a terrorist, we would have never let him in.

**Martin:** And what did he engage in that constitutes terrorist activity?

**Edgar:** I mean, Michel, have you watched it on TV? It's pretty clear.

**Michel:** No, it isn't. Well, explain it to those of us who have not or perhaps others who have not. What exactly did he do?

**Edgar:** Well, I think it's clear or we wouldn't be talking about it. I mean, the reality is that if you watch and see what he's done on the university ...

**Martin:** Do you not know? Are you telling us that you're not aware?

**Edgar:** I find it interesting that you're not aware.

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DHS Deputy Secretary Troy Edgar defends Mahmoud Khalil arrest : NPR

**Martin:** I think you could explain it to us. I think others would like to know exactly what the offenses are, what the propaganda was that you allege, what the activity was that you allege. Well, perhaps we can talk again and you can give us more details about this.

We really appreciate your coming to join us, and we do hope we'll talk again.

**Edgar:** Thank you.

*This story was edited by Kristian Monroe. Ximena Bustillo contributed to this story.*

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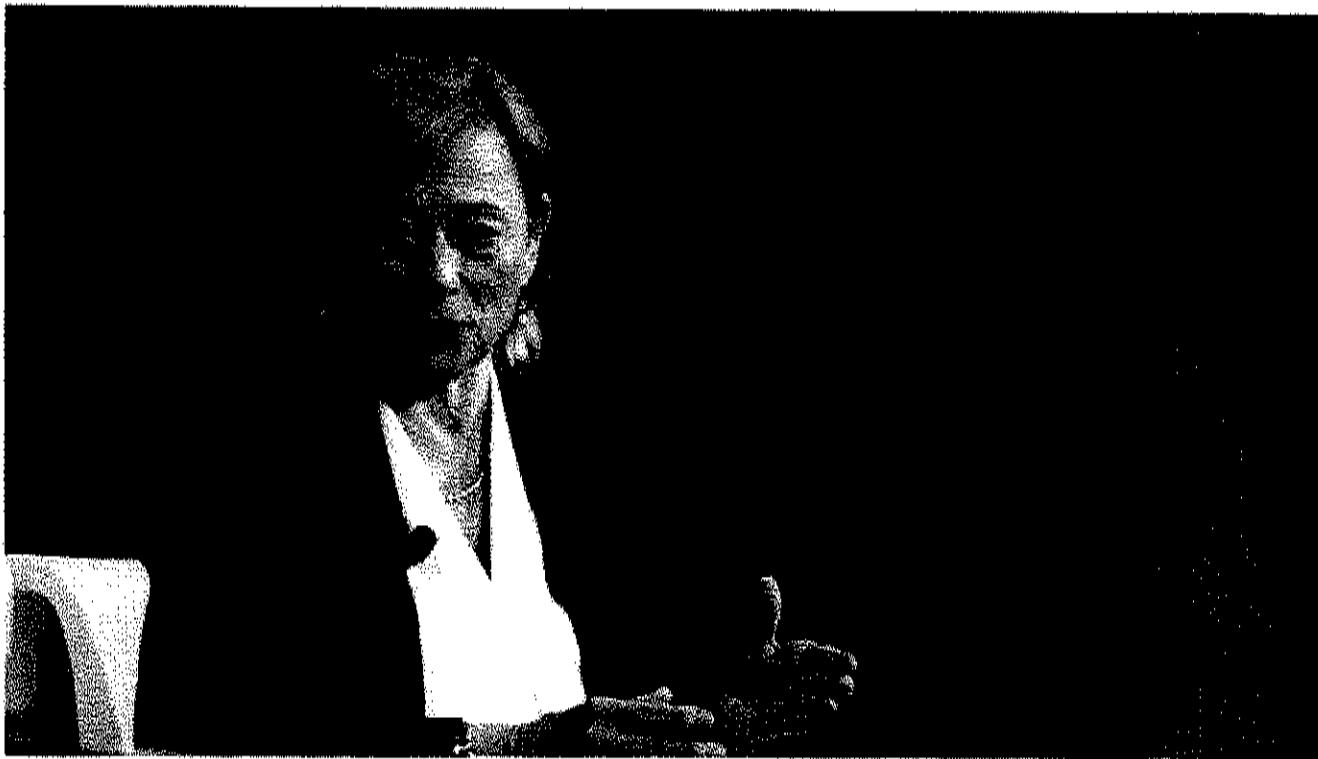
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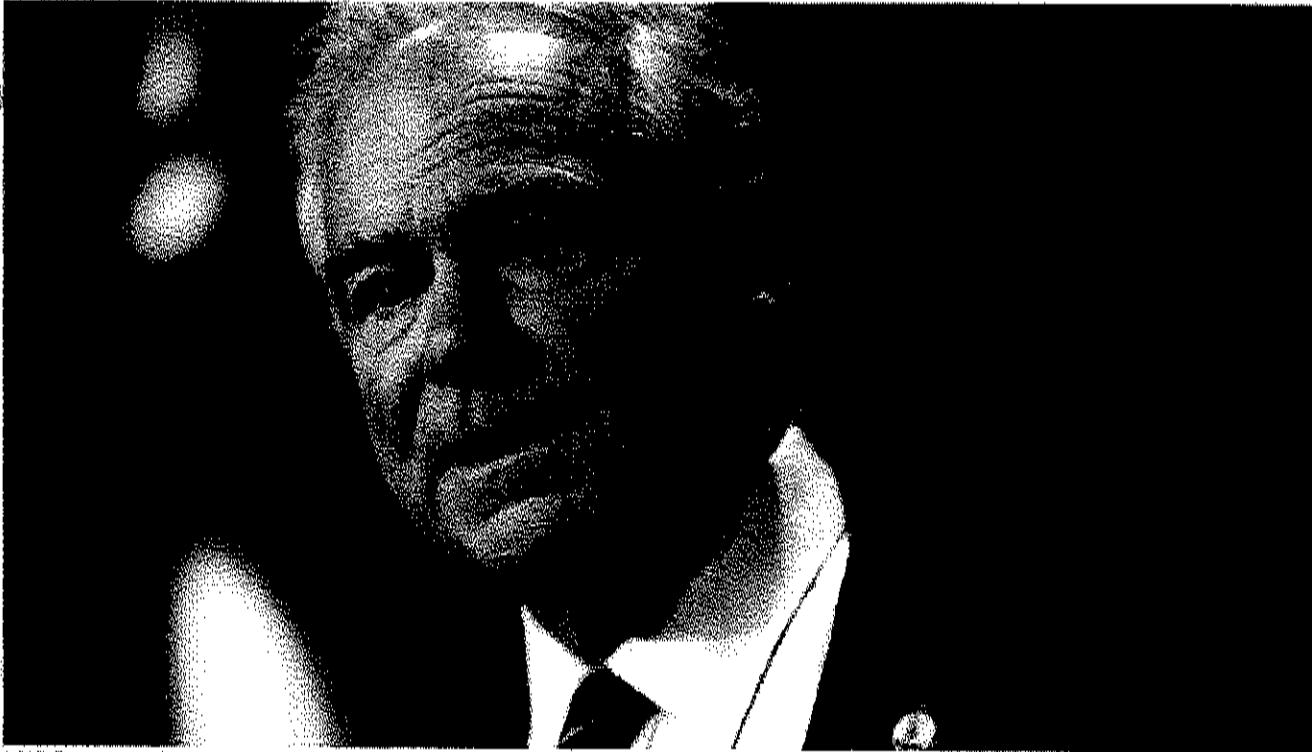


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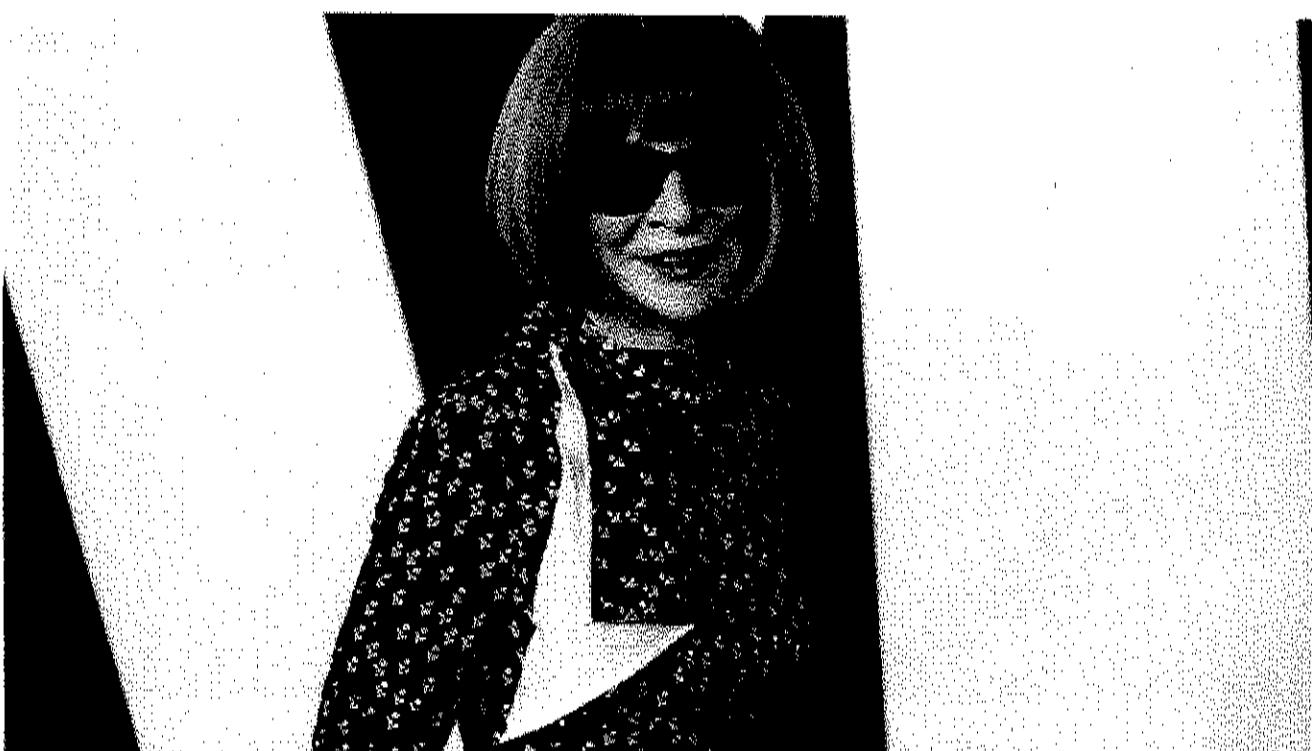
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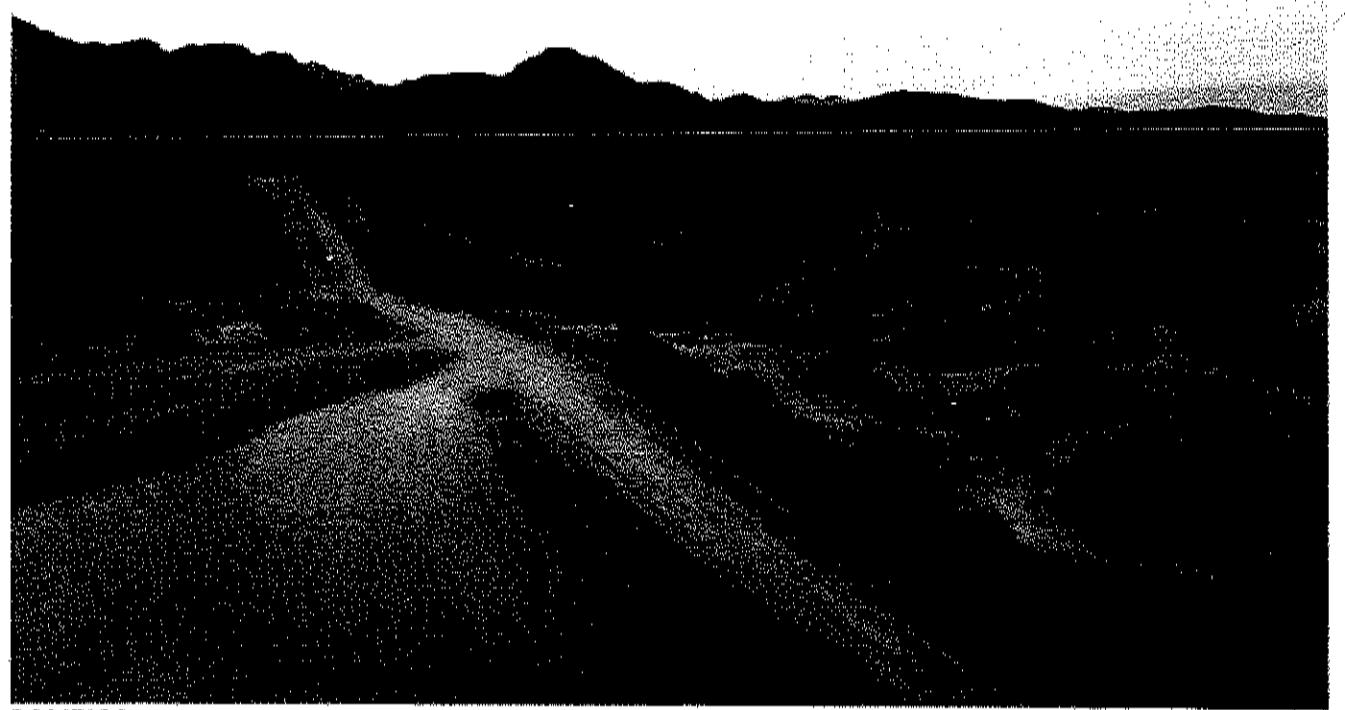
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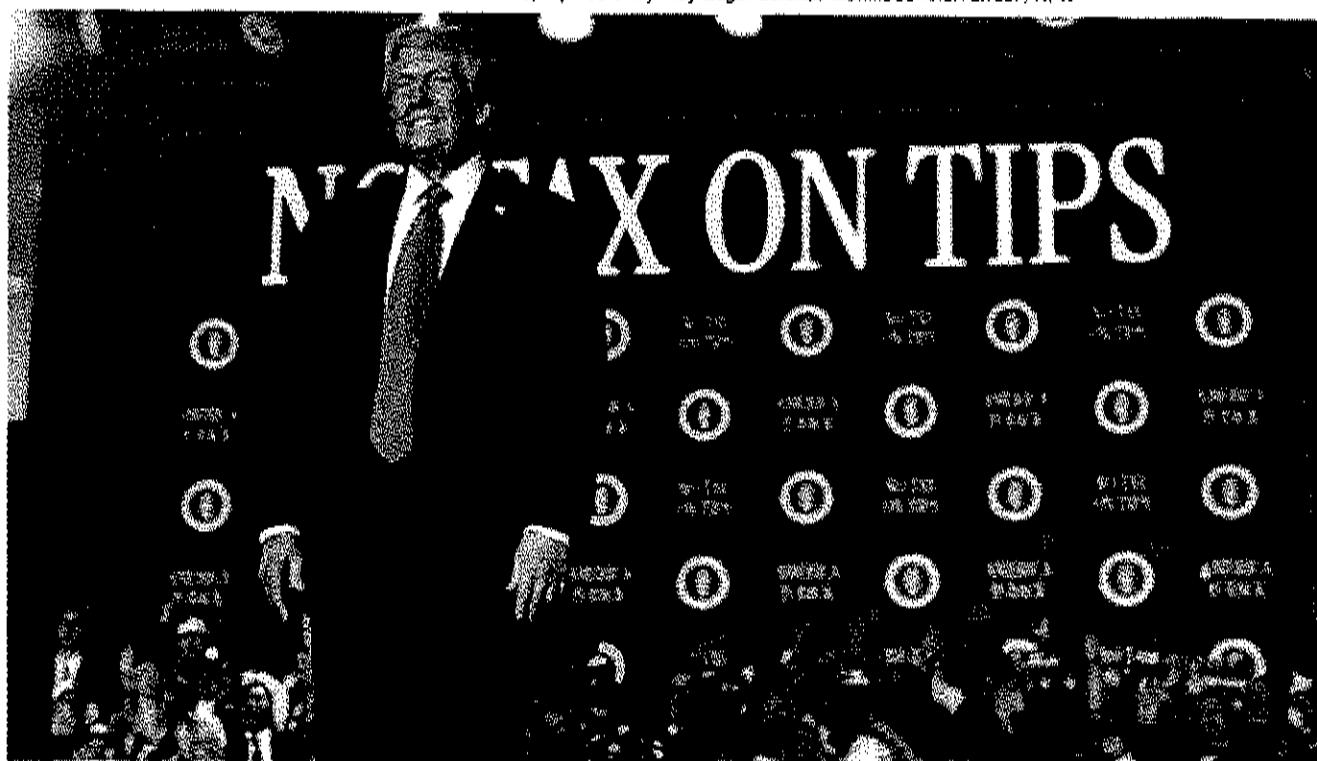


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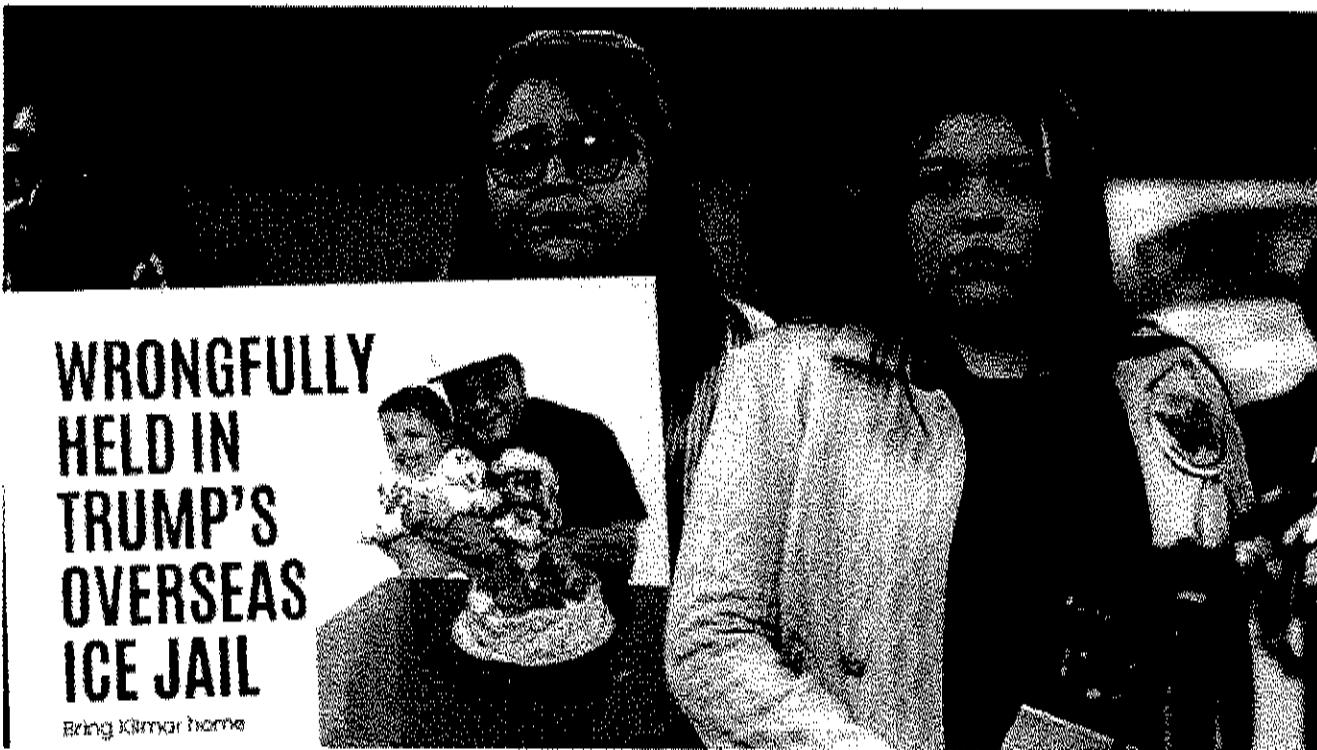
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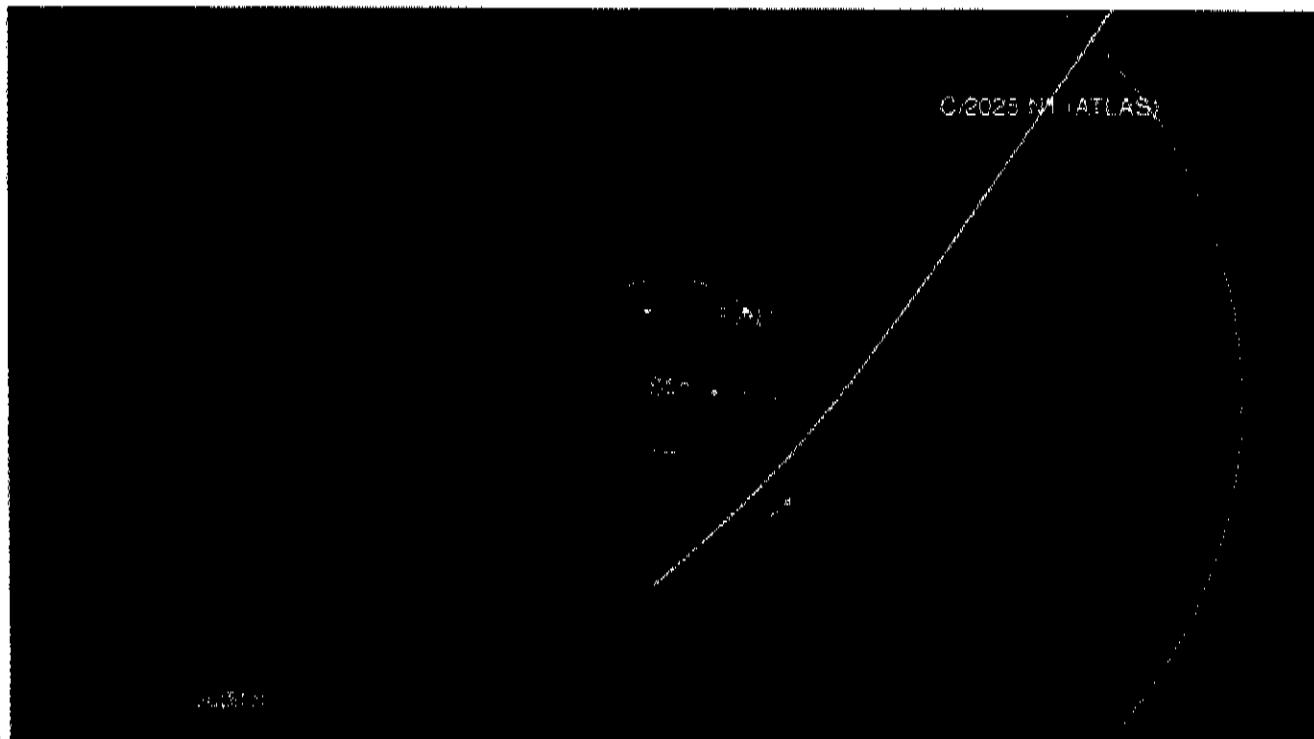
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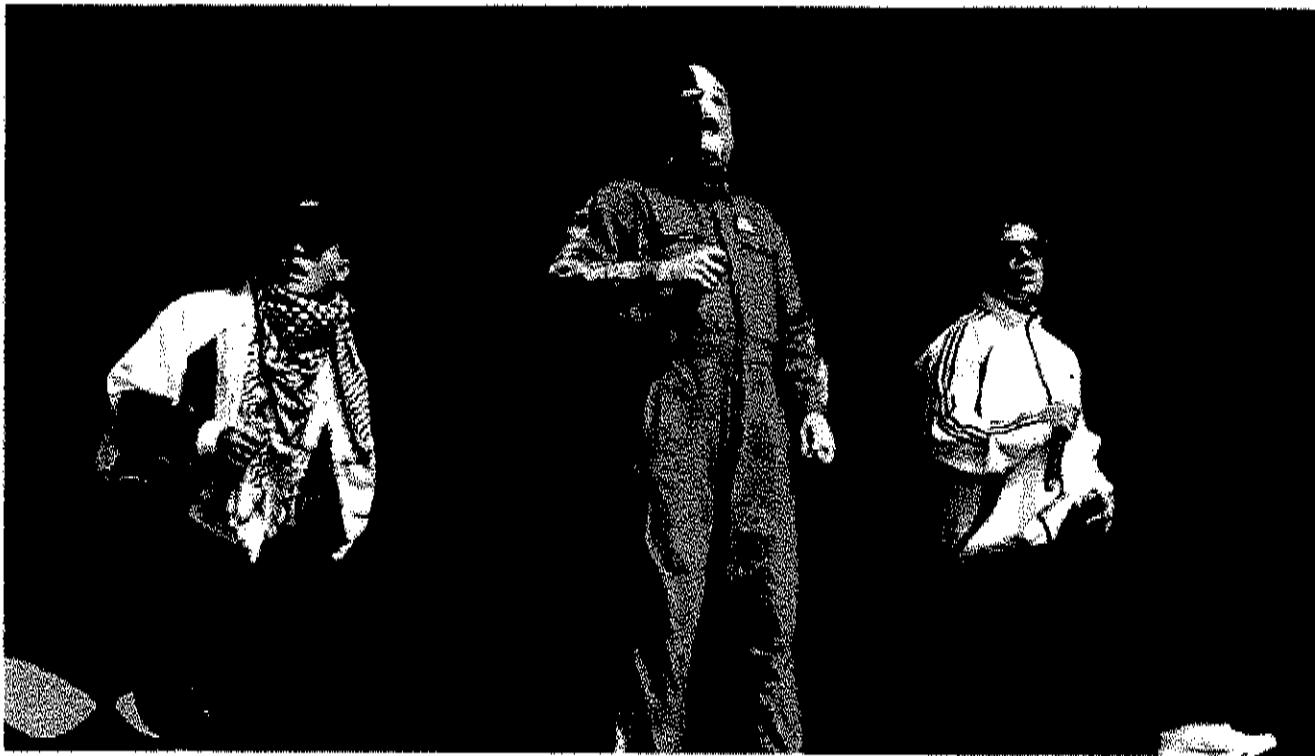
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