

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

Mahmoud KHALIL,  
*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-01963 (MEF-MAH)

**DECLARATION OF  
VERONICA R. SALAMA**

I, Veronica R. Salama, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Veronica R. Salama. I am a licensed attorney in good standing in the state of New York. I am an attorney of record in the above-captioned case. I represent the Petitioner-Plaintiff, Mahmoud Khalil, in this action.
2. Attached hereto, at the exhibits listed below, are true and correct copies of the following declarations:
  - A. Attached as **Exhibit A** is the Declaration of Petitioner-Plaintiff Mahmoud Khalil, dated June 4, 2025.
  - B. Attached as **Exhibit B** is the Declaration of Dr. Noor Ramez Abdalla, dated June 3, 2025, speaking to the harms that she and Mr. Khalil are experiencing to date as a direct result of the Determination and Petitioner's arrest and detention, including: chilling effects, family separation, and the trauma of detention.
  - C. Attached as **Exhibit C** is the June 4, 2025, Declaration of Johnny Sinodis, partner at Van Der Hout LLP and representing Mr. Khalil's in this matter and in his immigration proceedings, summarizing Mr. Khalil's immigration proceedings and related evidence—including the dismissal of post-hoc charge #7 by the immigration judge on April 22,

2025, DHS's decision not to cross-examine Mr. Khalil at this same hearing, and its failure to argue in support of the remaining charges in its June 2, 2025, closing arguments submission.

D. Attached as **Exhibit D** are declarations from the American Association of Urban Professors ("AAUP") about the broader chilling effect in colleges and universities and the uncertainty of how to conform conduct because of the Trump Administration's ideological exclusion Policy:

1. **Exhibit D-1:** Declaration of Veena Dubal, general counsel of the AAUP, a plaintiff in *American Association of University Professors v. Rubio*, No. 25-cv-10685, (D. Mass. filed Mar. 25, 2025), dated April 1, 2025, speaking on the principal ways in which the ideological-deportation policy has impeded and continues to impeded the AAUP, from carrying out its mission and the harm to AAUP campus chapters and members.
2. **Exhibit D-2:** Declaration of Ash Ü Bâli, the Howard M. Holtzmann Professor of Law at Yale Law School, member of the AAUP, and the current President of the Middle East Studies Association of North America ("MESA"), a plaintiff in *American Association of University Professors v. Rubio*, No. 25-cv-10685, (D. Mass. filed Mar. 25, 2025), dated April 1, 2025, speaking on the effect of the ideological-deportation policy on MESA's members.

E. Attached as **Exhibit E** are declarations by a professor and a student at Cornell University, speaking to the chilling effects they experienced from government's targeting of Momodou Taal, a non-U.S. citizen who, like Mr. Khalil, was targeted for removal based on his pro-Palestine expression.

1. Declaration of Mũkoma Ngũgĩ, Professor at Cornell University, dated March 14, 2025, filed as ECF 2-3 in *Taal v. Trump*, No. 3:25-cv-00335, (N.D.N.Y. filed Mar. 15, 2025).
2. Declaration of Sriram Parasurama, graduate student at Cornell University, filed as ECF 2-4 in *Taal v. Trump*, No. 3:25-cv-00335, (N.D.N.Y. filed Mar. 15, 2025).

F. Attached as **Exhibit F** are declarations from legal service providers speaking to a significant uptick in individuals seeking legal advice following Mr. Khalil's arrest, particularly those on university campuses, or those who had been previously been outspoken in support of Palestinian rights or simply because of their non-citizen status:

1. **Exhibit F-1:** Declaration of Victoria Porell, Senior Staff Attorney at Palestine Legal, dated June 3, 2025, reporting a 30% spike in legal support requests since Mr. Khalil's arrest and providing individual anonymized examples;
2. **Exhibit F-2:** Declaration of Golnaz Fakhimi, legal director of Muslim Advocates, dated June 4, 2025, reporting a sharp increase in non-citizens seeking legal support since Mr. Khalil's arrest, driven by fear that expressing views supportive



10. **Exhibit G-10:** Declaration of [REDACTED], [REDACTED], [REDACTED], dated June 2, 2025;
11. **Exhibit G-11:** Declaration of [REDACTED], Lecturer in the Department of [REDACTED] and postdoctoral scholar in [REDACTED] at Columbia University, dated June 2, 2025.

H. Attached as **Exhibit H** are declarations of students at Columbia University speaking to their own experiences and of their observations of chilled speech since Mr. Khalil's arrest and detention and the Rubio Determination:

1. **Exhibit H-1:** Declaration of [REDACTED], graduate student at Columbia University pursuing an [REDACTED], dated June 1, 2025;
2. **Exhibit H-2:** Declaration of [REDACTED], recent graduate of Columbia University, dated June 1, 2025;
3. **Exhibit H-3:** Declaration of [REDACTED], Jewish graduate [REDACTED], dated May 31, 2025.
4. **Exhibit H-4:** Declaration of [REDACTED], recent Jewish graduate of Barnard College, dated May 31, 2025;
5. **Exhibit H-5:** Declaration of Shay Orentlicher, student at Columbia University and organizer with Columbia-Barnard Jewish Voice for Peace (JVP), dated May 31, 2025;
6. **Exhibit H-6:** Declaration of [REDACTED], rising third-year PhD student and instructor at Columbia University, dated June 2, 2025;
7. **Exhibit H-7:** Declaration of [REDACTED], [REDACTED], dated June 3, 2025;
8. **Exhibit H-8:** Declaration of [REDACTED], recent graduate of [REDACTED], dated June 2, 2025;
9. **Exhibit H-9:** Declaration of [REDACTED], recent Jewish graduate of Columbia University with continued active involvement in the Columbia community, dated June 1, 2025, speaking to their experience and attaching a letter by Jewish Columbia alumni denouncing the arrest and detention of Mr. Khalil;
10. **Exhibit H-10:** Declaration of [REDACTED], [REDACTED], [REDACTED] dated June 2, 2025;
11. **Exhibit H-11:** Declaration of [REDACTED], recent Jewish graduate of Columbia University, dated June 2, 2025; and

12. **Exhibit H-12:** Declaration of [REDACTED], recent graduate of Columbia University, dated June 2, 2025.

- I. Attached as **Exhibit I** is the Declaration of Human Rights Watch (“HRW”) researcher John Raphling, dated June 4, 2025, describing the chilling effect on speech among international students and non-U.S. citizens in response to the Trump administration’s punitive actions against ‘dissenters,’ drawing comparisons to patterns of repression observed by HRW in authoritarian regimes.
- J. **Exhibit J** - is the Declaration from Stephanie Fox, Executive Director of Jewish Voice for Peace (“JVP”), dated June 2, 2025, on the chilled speech of both U.S. citizen and noncitizen JVP members.
- K. Attached as **Exhibit K** is the Declaration of immigration attorney Ira Kurzban, dated June 4, 2025, on the unusualness of detaining a lawful permanent resident, especially one with strong ties to the U.S., on fraud or misrepresentation grounds.
- L. **Exhibit L** Declaration of immigration attorney Stacy Tolchin, dated May 30, 2025, regarding how fraud and misrepresentation and Mr. Khalil’s likelihood of success obtaining a waiver even if the post-hoc charges were sustained.
- M. Attached as **Exhibit M** is the declaration from Josh Paul, former Director of Congressional and Public Affairs for the Bureau of Political-Military Affairs, U.S. Department of State, in his personal capacity, dated May 12, 2025 on immigration cases regarding international chill and harm and impact on public interest.
- N. Attached as **Exhibit N** is the declaration from Christopher J. Le Mon, former Deputy Assistant Secretary in the Bureau of Democracy, Human Rights, and Labor at the U.S. Department of State, in his personal capacity, dated June 4, 2025, on arbitrary detention being utilized to suppress speech in the U.S. under the Rubio Determination similar to practices in undemocratic countries.
- O. Attached as **Exhibit O** is the Expert Declaration of Andrew Rasmussen, PhD., a licensed psychologist in New York, documenting the clinical psychological harm Mr. Khalil is suffering from the shock of unjust arrest and continued detention and family separation, which will inevitably severely worsen absent release.
- P. Attached as **Exhibit P** is the declaration from Kerry Doyle, former Principal Legal Advisor for U.S. Immigration and Customs Enforcement (“ICE”) and former Immigration Judge, in her personal capacity, dated June 4, 2024, on the transfer of Mr. Khalil to Louisiana, his detention based on the Foreign Policy Ground, and the post-hoc charges as highly unusual.

Q. Attached as **Exhibit Q** is the declaration from [REDACTED], a licensed psychologist and [REDACTED], dated June 3, 2025, on the irreparable social and stigmatic harm that Mr. Khalil is and will likely continue to suffer in this country as a Palestinian Muslim subject to the Rubio Determination and other disparaging comments by high level government officials.

Executed on June 4, 2025  
New York, New York



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Veronica R. Salama  
Staff Attorney  
New York Civil Liberties Union Foundation