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No. 25-1113

IN THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

MOHSEN MAHDAWI,

Petitioner-Appellee,

 \mathbf{v} .

DONALD J. TRUMP, in his official capacity as President of the United States, PATRICIA HYDE, in her official capacity as Acting Boston Field Office Director, Immigration and Customs Enforcement, Enforcement and Removal Operations, J DOE, in official capacity as Vermont Sub-Office Director of Immigration and Customs Enforcement, Enforcement and Removal Operations, TODD LYONS, in his official capacity as 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 A. RUBIO, in his official capacity as Secretary of State, PAMELA BONDI, in her official capacity as U.S. Attorney General,

Respondents-Appellants.

On Appeal from the United States District Court for the District of Vermont District Court Case No. 2:25-cv-389

JOINT SPECIAL APPENDIX – VOLUME III

Case: 25-1113, 07/14/2025, DktEntry: 107.1, Page 2 of 137

BRETT A. SHUMATE Assistant Attorney General Civil Division

YAAKOV M. ROTH Principal Deputy Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General
Office of Immigration Litigation

MICHAEL P. DRESCHER Acting United States Attorney District of Vermont

ALANNA T. DUONG Senior Litigation Counsel

DHRUMAN Y. SAMPAT Senior Litigation Counsel Office of Immigration Litigation Civil Division, U.S. Dept. of Justice

Attorneys for Respondents-Appellants

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Petitioner's Motion for Release Under Mapp v. Reno	366
Reply Declaration of Mohsen Mahdawi	493

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

Petitioner,

v.

DONALD J. TRUMP, et al.,

Respondents.

Case No. 2:25-cv-00389

ORAL ARGUMENT REQUESTED

<u>DECLARATION OF ATTORNEY LUNA DROUBI SUBMITTED IN SUPPORT OF PETITIONER'S MOTION FOR RELEASE UNDER MAPP V. RENO</u>

- I, Luna Droubi, declare under penalty of perjury that the following is true and correct:
 - 1. I am an attorney for Mohsen Mahdawi.
 - 2. Attached as Exhibit 1-A is a true and correct copy of a declaration by Sahar Mor Bostock, dated April 24, 2025.
 - 3. Attached as Exhibit 1-B is a true and correct copy of a declaration by Abraham H. Oort, dated April 25, 2025.
 - 4. Attached as Exhibit 1-C is a true and correct copy of a declaration by Ali DeCuollo, dated April 24, 2025.
 - 5. Attached as Exhibit 1-D is a true and correct copy of a declaration by Amanda Helali.
 - 6. Attached as Exhibit 1-E is a true and correct copy of a declaration by Miriam R. Osofsky, Madeleine Pluhar, and Katherine Paul, dated April 26, 2025.
 - 7. Attached as Exhibit 1-F is a true and correct copy of a declaration by Asma Elhuni.

- 8. Attached as Exhibit 1-G is a true and correct copy of a declaration by Barbara DeFelice, dated April 25, 2025.
- 9. Attached as Exhibit 1-H is a true and correct copy of a declaration by Colleen Lannon, dated April 27, 2025.
- 10. Attached as Exhibit 1-I is a true and correct copy of a declaration by Nina McCampbell, dated April 27, 2025.
- 11. Attached as Exhibit 1-J is a true and correct copy of a declaration by Daniel Galperin, dated April 24, 2025.
- 12. Attached as Exhibit 1-K is a true and correct copy of a declaration by Scott McGee, dated April 27, 2025.
- 13. Attached as Exhibit 1-L is a true and correct copy of a declaration by Dianne Rochford, dated April 26, 2025.
- 14. Attached as Exhibit 1-M is a true and correct copy of a declaration by Erin Walthour, dated April 28, 2025.
- 15. Attached as Exhibit 1-N is a true and correct copy of a declaration by Jonathan Chaffee, dated April 24, 2025.
- Attached as Exhibit 1-O is a true and correct copy of a declaration by Donald M. Kreis, dated April 26, 2025.
- 17. Attached as Exhibit 1-P is a true and correct copy of a declaration by Henry Swayze, dated April 17, 2025.
- 18. Attached as Exhibit 1-Q is a true and correct copy of a declaration by Hilary Hamilton, dated April 27, 2025.

- 19. Attached as Exhibit 1-R is a true and correct copy of a declaration by the Leadership of Sisterhood of Salaam Shalom.
- 20. Attached as Exhibit 1-S is a true and correct copy of a declaration by Jill Lloyd, dated April 27, 2025.
- 21. Attached as Exhibit 1-T is a true and correct copy of a declaration by Daisy Goodman, dated April 25, 2025.
- 22. Attached as Exhibit 1-U is a true and correct copy of a declaration by John H. Vogel Jr., dated April 26, 2025.
- 23. Attached as Exhibit 1-V is a true and correct copy of a declaration by Richard W. Sheppe Jr., dated April 27, 2025.
- 24. Attached as Exhibit 1-W is a true and correct copy of a declaration by Mary M. Erdei, dated April 17, 2025.
- 25. Attached as Exhibit 1-X is a true and correct copy of a declaration by Michael Denmeade.
- 26. Attached as Exhibit 1-Y is a true and correct copy of a declaration by Carolyn Griffeth.
- 27. Attached as Exhibit 1-Z is a true and correct copy of a declaration by Julia Neily, dated April 27, 2025.
- 28. Attached as Exhibit 1-AA is a true and correct copy of a declaration by Kerry Rochford Hague, dated April 26, 2025.
- 29. Attached as Exhibit 1-AB is a true and correct copy of a declaration by Isabelle Hazar, dated April 27, 2025.
- 30. Attached as Exhibit 1-AC is a true and correct copy of a declaration by Tina Wendon.
- 31. Attached as Exhibit 1-AD is a true and correct copy of a declaration by Sabrina Rowell.

- 32. Attached as Exhibit 1-AE is a true and correct copy of a declaration by Sarah Taylor and Moshe Braner.
- 33. Attached as Exhibit 1-AF is a true and correct copy of a declaration by Laura Simon.
- 34. Attached as Exhibit 1-AG is a true and correct copy of a declaration by Nancy J. Pedrick.
- 35. Attached as Exhibit 1-AH is a true and correct copy of a declaration by Noelle G. Vltt, dated April 27, 2025.
- 36. Attached as Exhibit 1-AI is a true and correct copy of a declaration by Richard P. Morse.
- 37. Attached as Exhibit 1-AJ is a true and correct copy of a declaration by Simon Dennis, dated April 17, 2025.
- 38. Attached as Exhibit 1-AK is a true and correct copy of a declaration by Lily Denmeade.
- 39. Attached as Exhibit 1-AL is a true and correct copy of a declaration by Patricia Whitney.
- 40. Attached as Exhibit 1-AM is a true and correct copy of a declaration by Paul D. Manganiello dated April 28, 2025.
- 41. Attached as Exhibit 1-AN is a true and correct copy of a declaration by Carmen T. McCampbell dated April 27, 2025.
- 42. Attached as Exhibit 1-AO is a true and correct copy of a declaration by Judith Bernardine Hertog.
- 43. Attached as Exhibit 1-AP is a true and correct copy of a declaration by Charles Wooster and Susan Kirincich dated April 27, 2025.
- 44. Attached as Exhibit 1-AQ is a true and correct copy of a declaration by Robert E. Pitiger dated April 26, 2025.
- 45. Attached as Exhibit 1-AR is a true and correct copy of a declaration by Emma Woloshin.
- 46. Attached as Exhibit 1-AS is a true and correct copy of a declaration by Alice Werbel.

Case: 25-1113, 07/14/2025, DktEntry: 107.1, Page 9 of 137 2:25-cv-00389-gwc Document 46 Filed 04/29/25 Page 6 of 127

- 47. Attached as Exhibit 1-AT is a true and correct copy of a declaration by Elizabeth Gardner dated April 28, 2025.
- 48. Attached as Exhibit 1-AU is a true and correct copy of a declaration by Mr. Mahdawi's exwife dated April 17, 2025.

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

Executed on April 29, 2025, in New York, New York.

/s / Luna Droubi Luna Droubi

EXHIBIT 1-A

- I, Sahar Mor Bostock, declare under penalty of perjury that the following is true and correct to the best of my knowledge:
 - 1. My name is Sahar Mor Bostock. I am over the age of eighteen, competent to testify, and submit this declaration in support of Mohsen Mahdawi.
 - 2. I am one of the principal authors of the letter entitled "Letter in Support of Mohsen Mahdawi on Behalf of Israelis," attached hereto. I participated directly in drafting and editing the letter, collaborating with other Israeli citizens and allies in the United States.
 - 3. The process of creating the letter was collective and deliberative. Multiple individuals contributed to its content, including but not limited to: Josh Drill, Roni Ziv, Michael Baratz, Michael Fux, Aharon Dardik, Nadav Nazarathy, Ariana Pinsker-Lehrer, and Amos Laor. We discussed and refined the language to accurately represent our shared views.
 - 4. The letter was circulated for signatures using a Google Form. Signing requires signatories to include their email address. All addresses are saved in our database. The letter currently has 459 signatories, 206 of whom identify as Israeli and an additional 253 whom identify as allies. A "live" version of the letter is available at https://docs.google.com/forms/d/e/1FAIpQLSe_vIFENRdGt0B6V_kGJkGjJGhy QmMJQ79jum56b8QM7-SmLQ/viewform
 - 5. A version of the letter was published on the *Forward*'s website at: https://forward.com/opinion/712747/ice-vermont-mohsen-mahdawi-columbia-university/
 - 6. While we cannot reasonably verify all 459 signatures on the letter, based on my personal knowledge of many of the signatories, it is reasonable to believe that each signature comes from a real person who agrees with the content of the letter.
 - 7. I personally know Mohsen Mahdawi. I have worked with him in various contexts and can attest that he is an ally for peace, consistently advocating for dialogue and cooperation between Israelis and Palestinians. We participated together in talks with Israelis and Palestinians aiming to reach an understanding about a peaceful resolution in Israel-Palestine, based on a vision that Mohsen had built. We also took part in conversations with the Columbia University administration aiming to pacify the atmosphere on campus. I elaborated on our relationship in a letter to the court on April 17, 2025.
 - 8. I am personally acquainted with many of the signatories to the letter, including numerous members of the Israeli and Jewish communities in the United States and allies supportive of peace and justice.
 - 9. In my opinion, any allegations that Mohsen Mahdawi's presence in America could have an adverse foreign policy impact are absurd. Mohsen is not a threat;

- he is a partner for peace whose detention undermines the values of free speech and democracy. I firmly believe that Mohsen should be freed from prison.
- 10. The letter summarizes our collective outrage at the detention of Mohsen Mahdawi by ICE, emphasizing his role as a peace advocate and bridge-builder between Israelis and Palestinians. It rejects the use of immigration enforcement as a tool to suppress political speech and highlights the chilling effect such actions have on free expression and nonviolent activism. The letter calls for Mohsen's release and urges solidarity against political repression.
- 11. I affirm that the attached letter accurately reflects the views of its authors and signatories, including myself. To the best of my knowledge, the facts and opinions stated therein are true and correct.
- 12. I submit this declaration on 04.24.2025, at New York, NY.
- 13. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 04.24.2025 Location: New York, NY.

Sahar Bostock

Sahar Mor Bostock

Letter in Support of Mohsen Mahdawi on Behalf of Israelis

We are a group of Israeli citizens in the U.S. who are appalled by the immoral detainment of Mohsen Mahdawi, a Palestinian activist and an advocate of peace, by ICE. Some of us previously wrote against the threat of deportations when the Trump Administration first issued its January 29 executive order, "Additional Measures to Combat Anti-Semitism." We stated then and still assert that this act does not protect us, it endangers us. We reject the use of deportations to suppress free speech under the guise of combating antisemitism. The case of Mohsen Mahdawi in particular reveals that the pretext of protecting Jews is falsely being used to further the Trump Administration's extreme agends of silencing political voices that do not align with it.

Many of us experienced the past year and a half on Columbia's campus in a deeply personal and emotional way. We are deeply impacted by the experiences of antisemitism and hate on our campus, and disheartened by the lack of nuanced dialogue on campus and within society at large about the Israeli-Palestinian conflict. However, we adamantly oppose the use of the immigration system as a punitive political tool and an alternative to the criminal justice system when no crime has been committed. The United States has a long tradition as a bastion of free speech. Sometimes that even means allowing speech we oppose or causes us deep discomfort and emotional harm. Nevertheless, freedom of speech is a pillar of democracy. Not only is it a constitutional right but a human right that must be applied to non-citizens, visa and green card holders as well. We as Jews must be applied to non-citizens, visa and green card holders as well. We as Jews safety lies in solidarity with other vulnerable groups. We will not allow our pain to be used safety lies in solidarity with other vulnerable groups. We will not allow our pain to be used to pursue an anti-democratic agenda.

We oppose the deportation of anyone based on their viewpoint. The targeting of Mohsen is especially absurd given his prominent voice in advocating for dialogue and cooperation between Israelis and Palestinians on Columbia's campus, in the NYC community, and beyond. Mohsen actively built ties with Israelis, understanding that the only sustainable way forward in Israel/Palestine is through shared work between Israelis and Palestinians. Many of us have worked with and gotten to know Mohsen on a deeply personal level. We have been moved by his empathy, kindness, and fortitude. Several of us feel that working with Mohsen has been the most valuable experience of our time at Columbia University.

Mohsen's presence and leadership on campus gave us hope that Israelis and Palestinians could work together not just to understand each other, but to transform our societies and create a peaceful resolution. For there to be any chance of healing emotional wounds and building a shared future, we must all have the freedom to speak and protest, especially when we disagree. Deporting Mohsen would send a devastating message: that there is no space for bridge-building or peace work at Columbia University or in the U.S. It would suggest that the U.S. government and Columbia University prefer to sustain division rather than support the students and community for reconciliation and peace.

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alternatives to violence, directly endangering Israelis and Palestinians even more. notion that nonviolent resistance, dialogue, and cross-community building are not viable on political and human rights issues. In doing so, the Trump administration reinforces the message that those who oppose the war on Gaza will pay a heavy price for speaking out Mohsen creates a dangerous chilling effect on speech: the government is sending a objection to Israeli policy takes. Trump's policies are proving them right. The detention of Many Palestinians have argued that they are marginalized no matter what form their

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possibility of liberation for all, Palestinians and Israelis. him in immediate danger. It will constitute an attack on our collective future and the injustice, and we want to create a world of coexistence". Deporting him will not only put reality of love and peace. We reject contributing to the ongoing cycle of violence and meetings: "We are the new generation and want for our children to live a new reality, a a commitment to human rights, dialogue, and peace. As Mohsen put it during one of our on every element of the conflict, and often have differing tactics or strategies, we all share Mohsen Mahdawi is not a threat, he is a partner for peace. While some of us may not agree

voice, your presence, and your solidarity matter at this crucial time. Mahdawi and to stand against the use of deportation as a tool of political repression. Your Join us this Sunday at 4 PM in Union Square, NYC to demand the release of Mohsen We urge all who care about human dignity, democracy, and peace to take action with us.

Signatures: (459)

Sahar Bostock, Columbia University

4. Michael Baratz, Columbia University

6. Michal Fux

7. Amos Laor, Columbia University

8. Nadav Nazarathy

9. Sophie Shnaper

10. Ariana Pinsker-Lehrer, Columbia School of Social Work, 25'

12. Maya Herman, The New School

22. Ben Weinberg

20. Esty Dinur 19. Adam Finn 18. Ruti Margalit

16. Yael Niv 15. Eran Zelnik 14. M Shohet 13. Roni Tamari

21. Didi Tal, Columbia University

11. Noa Wolf

17. Ori Shaham, Friends of Standing Together

5. Roni Ziv, Columbia University

3. Josh Drill, Columbia University

2. Aharon Dardik, Columbia University

Israelis:

- 23. Mieka Polanco

- 26. Idan Erez
- ivZ-nə8 tələyA .8S
- 29. Shachar Cohen-Hodos, Columbia Alum
- 32. Ayelet Marron, Rutgers University

- 34. Avraham Kelman, Stanford University

- 38. Michal Roth

- 41. Illan Gonen, Lecturer, Columbia University

- 46. Moam Shoresh, Broad Institute of Harvard and MIT
- 48. Yiselle S Blum, Friends of Standing Together NYC, Israelis for Peace NYC

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- 49. Noam Roth
- 51. Eitan Berechman, UnXeptable, J Street, Friends of Standing Together

60. Idit Klein

58. Avigail Milder

56. Shai Wosner 55. Yuval Hoshen

59. Chaim Shimshowitz

57. Avital Shimshowitz

- 54. Noa Osheroff

 - 53. Gal Cohen
- 52. Nomi Sofer

69. Lani Ravin, VT Friends of Standing Together

- 50. Ilana Axel, Friends of Standing Together

- - 47. Oren Pollak, Friends of Standing Together
 - - 45. Yael Magnes

 - 44. Karen Ross

 - 43. Noam Weiss
 - 42. Edo Roth
 - 40. Shelly Feldman
 - 39. Edna Gruvman, Nassau Community College

 - 37. Rommy Sasson, Yale College '27
 - 36. Sharon Alexander
 - 35. Amichai Lau-Lavie
 - 33. Yaffa Maritz, Jstreet
 - 31. Inbal Sansani

 - 30. Aryeh Cohen, American Jewish University

 - 27. Keren Assaf, Student
 - 25. Yona Kidron Shalev

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- 24. Gili Getz

70. Michal Rubin

68. Shalev Gilad 67. Shula Gilad 66. Hila Ratzabi 65. Ruth Erez 64. Idan Ben Yakir 63. Avital Ben-Joset 62. Yaala Ballin 61. Benny Garfinkel

71. Ravit Duncan, Rutgers University

(2)

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120. Jennifer Raviv 719. Noa Baum

118. Orna Ziv

117. Daniela Lichtman

116. Yuval Nathaniel, Hashomer Hatzair USA

115. Roni Corcos

114. Michal David

113. Tamara Gayer, Israelis for Peace & Friends of Standing Together

112. Anonymous, Columbia University

111. Sivan Rosenthal, CUNY SPH

110. Omer Nathaniel, Hashomer Hatzair USA

109. Meirav Levy-Bernstein

108. Lior Ben-Zvi

107. Dov Greenwood, Yale College '22

106. Amira Saunders

105. Adi Meyerovitch, Yale University

104. Ben Linder

103. Alon Jasper

102. Lian Malki-Schubert

101. Ariel Naveh

100. Eliyahu T, Columbia University

99. Alon Geva

98. Amit Shilo, University of California, Santa Barbara

97. Maya Ben-Meir

96. Anat Meiri, Israelis for Peace

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94. Tamar Glezerman, Israelis for Peace NYC

93. Cynthia Rahav

92. Stav Zeitouni

91. Aya Rosen

90. Adam Shaham

89. Gabriella Ginsberg-Fletcher

88. Maera Hagage

87. Noga Khen, Shoresh US

86. Navah Steiner

85. Dov Greenwood, Yale College '22

84. Abby Stein

83. Jenn Lewin

82. Misha Shulman

81. Hadar Ahuvia, Student Rabbi, Kolot Chayeinu

80. Yonathan Shapir, University of Rochester

79. Lisa Fliegel

78. Shai Jaschek

77. Iky Salinas, UMass Boston

76. Stav Hinenzon

75. Hadar Susskind

74. Shai Jaschek

73. Alon Jasper, NYU

72. Leah Yael Levy

- 169. Jonathan Legum
- **678 AL** 168. Shamai Leibowitz
 - 167. Roni Zahavi-Brunner
 - 166. Esther Sperber
 - 165. Itamar Ben Zimra
 - 164. Roni Shaham, Hashomer Hatzair USA
 - 163. Romy Achituv
 - 162. Ari Yovel
- 161. Eilam Ben-Zvi, Rutgers University and Hashomer Hatzair
 - 160. Jonathan Goldberg, UnXeptable
 - 159. Dana Golan
 - 158. Ella Doron-Mandel, Columbia Univetsity
 - 157. Neeve Levi, Columbia GS '24
 - 156. Dani Eshed, Friends of Standing Together
 - 155. Nadav Peled
 - 154. Yasmine Guedalia
 - 153. Susan Lax
 - 152. Netta-Lee Lax
 - 151. Morit Gaifman
 - 120. Gili Nir
 - 149. Max Gertzen
 - 148. Shelly Lev-Er
 - 147. Aviva Weisgal, The Democratic Party of Israel
 - 146. Oshri Hakak
 - 145. Michal Greenfield
 - 144. Adi Dzen, NYU
 - 143. Oren Beit Ari

 - 142. Adi G
 - 141. Ori Ben Zvi, Hashomer Hatzair USA
 - 140. Rachel Bart, Hashomer Hatzair USA
 - 139. Jonathan Beit-Aharon, Walnut Street Minyan
 - 138. Jonathan Beit-Aharon
 - 137. Rivka Perlmann

 - 136. Eitan Almagor, USC 2013
 - 135. Tali Rubinstein
 - 134. Daniel Max
 - 133. Noga Ami Rav
 - 132. Johanna Cypis
 - 131. Anonymous, Jewish Theological Seminary
 - 130. Mor Cohen
 - 129. Mika Yaakoba-Zohar
 - 128. Hadas Binyamini
 - 127. Michal Koch, Friends of Standing Together
 - 126. Libby Lenkinski, New Israel Fund/ Albi
 - 125. Herzl Schubert
 - 124. Yossi Khen
 - 123. Cassie Arison
 - 122. Gal Nissan, Teachers College
 - 121. Eden Braunstein

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- 170. Elimelch Bilas

- 173. Ophir H
- 174. Mikey Aboutboul, UCLA

- 181. Val Oved Giovanini
- 182. Karen Abrams Gerber, Rally Point for Collaborative Change, LLC

- 185. Aaron Back, A Land For All: Two States One Homeland

- 196. Emily Winograd, Barnard College 2012, Standing Together
- 197. Rivka Einy

- 201. Eyal Rozmarin

- 200. Danny Fox, MIT

- - 199. Dana Stern

206. Zvi Ladin 205. Yahel Ben-Zvi

> 203. N Kornberg 202. Eldad Arad

- 198. Esther Rapoport

4. Pattie Heyman, Friends of Standing Together

204. Hagar Adam, Friends of Standing Together

- 195. Erica Sigmon, NYU Alum, Israelis for Peace
- - 194. Max Finkel, Columbia GS '16

 - 193. Itai Shargian, Hashomer Hatzair USA
 - 192. Noga Nathaniel, Hashomer Hatzair USA
 - - 191. Liel Kadouri

 - 190. Rivka Einy

 - 189. Tamar Lavy

 - 188. Nadja Barlera, Israelis for peace NYC

 - 187. Noam Sender
- 186. Pini Herman, American Friends of Standing Together
 - - - 184. Ashi Schwartz, Hebrew University
 - 183. Itamar Haritan, Cornell University
 - - - - 180. Gideon Yefet
 - 179. Adeena Hudes, Jewish Orthodox
 - 178. Tirza Ben-Porat
 - 177. Reba Carmel
 - 176. Liv Berg
 - 175. Shmuel Afek
- 172. Gabriella Ginsberg-Fletcher, Columbia University, GS '18, SIPA '19

 - 171. Yaakov Komisar

9. Rebecca Sealfon 8. Tania Doonya

7. Sarah Wexler 6. Naomi Bergeron 5. Rachel Burnett, NYU

> 3. Elaine Landes 2. Arnaud Amzallag 1. Janine Sopp

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(2)

- 188 AL
- 57. Martha Kransdorf
- 58. Shifra Sharlin
 - 56. Julie Spiegel
 - 55. Caroline Poplin
- 54. Naor Deleanu, SF Bay Area Friends of Standing Together
 - 53. David Loud
 - 52. Zeva Shapiro
- 51. Rabbi Simkha Y. Weintraub, Rabbinic Director (Retired), Jewish Board, NYC
 - 50. Steven Nasir
 - 49. Natasha Dresner
 - 48. Mira Stern

 - 47. Nashira Pearl, Friends of Standing Together
 - 46. Heather Levi, Friends of Standing Together
 - 45. Emily Pratt
 - 44. Sara Lamnin, Jewish Elected Official
 - 43. Julia Röhl
 - 42. A. Colby
 - 41. Edward Grupper

 - 40. Sarah Seltzer

 - 39. Gail Jaitin
 - 38. Jernee Montoya
 - Nancy Reinhardt
 - 36. Laurie Pollack, Friends of Standing Together

 - 35. Reva Stein, Boston Friends of Standing Together
 - - 34. Tara Meyer Dull, Peace Activist
 - 33. David Knapp
 - 32. Janet Kossy, Sydney Friends of Standing Together

 - 31. Irene Ulman, Friends of Standing Together
 - 30. Randall Wilson
 - 29. Roberta Wall, Romemu Congregation, NYC
 - 28. Karen Averill
 - 27. Donna Joy Janovsky, Friends of Standing Together

 - 26. Leslie Shalom, Barnard College
 - - 25. Harry Grupper
 - 24. Seth Caplan, Friends of Standing Together
 - 23. Naomi Sharlin
 - 22. Rabbi Margo Hughes-Robinson, Partners for Progressive Israel

 - 21. Jasmine P
 - 20. Patricia Leroy
 - 19. Lily Fox
 - 18. Laura Gross
 - 17. Amy Shire, Barnard College; Friends of Standing Together
 - 16. Amy Cohen, Brown University
 - 15. Sabrina Tropper
 - 14. Rachelle Abrahami

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- 13. Sarah Stone, Columbia University GS '16, SIPA '19
 - 12. Shani Ankori
- 11. Julie Cohen, Columbia Journalism School, (MS, '89)

- 107. Jonathan Taubes
- **388 A**L
- 106. Gordon Myers, Adat Shalom
- 105. Rabbi Sid Schwarz, Adat Shalom Reconstructionist Congregation, Bethesda, MD
 - 104. Nancy Becker
 - 103. Barbara Green, J Street
 - 102. Laura Simms, Hans Christian Andersen Storytelling Center
 - 101. Paul Zeitz, Rabbis for Ceasefire
 - 100. Marsha Teichman, Reconstructionist
 - 99. Maya Seligman, Friend of Standing Together
 - 98. Mia Kang
 - 97. Suzan Moss, JREJ
 - - 96. Sarah Rosen
 - 95. Sonia Sundelson
 - 94. Sydney Levy
 - 93. Ted Hochstadt
 - 92. Aaron Shneyer
 - Agila nosilA . Fe
 - 90. Nara Garber, MFA, Columbia School of the Arts
 - 89. Shelley Gross
 - 88. Emily Rosenberg
 - - 87. Estella Dieci
 - 86. William Welkowitz
 - 85. Norman Cohen, Kane Street Synagogue
 - 84. Monica Raymond
 - 83. Brian Field, US Rabbi
 - 82. Robert Snyder, Rutgers Professor Emeritus
 - 81. Batya Billinkoff
 - 80. Ann Shapiro
 - 79. Lawrence Borins, Congregation Eitz Chayim Cambridge
 - 78. Roberta Wall, Center for Monviolent Communication
 - 77. Anne Steele, Friends of Standing Together
 - 76. Belita Leal
 - 75. Judith Glass, Barnard (1958)
 - 74. Martin Horwitz
 - 73. Libbe Madsen
 - 72. Rebecca Gerber, Barnard alum, Friend of Standing Together
 - 71. Max L
 - 70. Julie Terestman, Village Zendo
 - 69. Maria Cruz Garcia
 - 68. Daniel Price
 - 67. Erik Schnabel
 - 66. Liz Cohen
 - 65. Naomi Reshotko
 - 64. Ronald Shiffman, Professor Emeritus, Pratt Institute
 - 63. Stuart Weinstock, Columbia College '05, Columbia School of the Arts '09
 - 62. Zachary F. Ramsfelder
 - 61. Caroline Portis, Friend of Standing Together
 - 60. Brian Schill
 - 59. Darryl Bloom

- 109. Abraham Plaut, Friends of Standing Together
- 110. Amanda Glasser, Friends of Standing Together
- 112. Maurice Msabimana, Columbia University SIPA 2005
- 113. Sheila Blum
- 114. Adam Myers
- 116. Avi Glickstein, Friends of Standing Together (Columbia College '98)

- 121. Sheila Weinberg
- 122. Matthew Tarpley

- 125. Robert Ambaras
- 126. Judy Wall
- 128. David Abraham, University of Miami
- 129. Kevin Walsh
- 131. Marla Zipin
- 132. Marion Kaplan, Prof. of Modern Jewish History, emerita, NYU

- 135. Leslie Neustadt, J Street, Congregation Berith Shalom, Troy, NY, Partners for
- 136. Layna Chen, Student
- 137. Sherri Meuwirth, JStreet

- 139. Stacey Farber, J Street; Friends of Standing Together

- 141. David Abraham, University of Miami School of Law

145. Benjamin Lambert, LPC Friends of Standing Together

140. Joel S Grantz

143. Lindsay Moran 142. Hedda Kafka

144. Isaac Shamam, Friends of Standing Together

150. Andrea Hodos, Columbia/JTS Alumni Parent

- 138. Margot Barnet, Friends of Standing Together
- - - Progressive Israel
- - - 134. Laura McMurry

 - 133. Janis Todd
 - - - 130. Ruth Potts

 - 127. Adam Schneit, Friends of Standing Together
 - - 124. Aaron Ocken
 - 123. Beth Sapiro

 - - 120. Sirina Sucklal

 - 119. Ellen Stutman
 - 118. Henry Cham

 - 117. Zahava D Doering, Indepdent Scholar

 - 115. Mirele Goldsmith

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- 111. Jennifer Sherman

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152. Leslie Lomas (MFA '14)

149. Harold Watson 148. Alana Hassanein 147. Patricia Potter 146. Emma Gobler

(2)

151. Sarah Dorman Sveen, Friends of Standing Together, Columbia School of the Arts

155. Mohammed Misbahuddin Page 19 of 127 2:25-cv-00389-gwc Filed 04/29/25 Document 46

156. Caroline Shapiro

157. Gloria Klaiman, Jewish American

158. G Graves

159. Sandra Hayward

160. Amber Brodsky

161. Victor Wainschtok

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163. Lara Kingstone, Hunter college

164. Angela Di Manno

165. Micole Pimentel Soler, Columbia University

166. Jeanne Donegan

167. Miriam Hansen, Jewish Canadian American

168. Dori Bailin

169. Kara Lakes

170. Adam Levine

171. Alice Silverman, US Jewish citizen

172. Debra Bailin

173. Marisa Melamed

174. Sue Mendelsohn, Columbia University

175. Steffan Becker, Friends of Standing Together

176. Briann Shear

177. Joyce Kahn, Member, Beth Jacob Synagogue, VT

178. Charlotte Steiner, Friends of Standing Together

179. Louis Sallerson

180. Fran Levine, Beth Jacob Social Justice Committee

181. Vanessa Brown

182. Carolyn Herz, Beth Jacob Synagogue Montpelier VT

183. Jamie Carroll, Friends of Standing Together, Jewish

184. Kate Maness

185. Irle Goldman

186. Hannah Sha'afi

187. Rabbi Scott Perlo, Adat Shalom Reconstructionist Congregation, Bethesda MD

188. Stephen Hellman, Adat Shalom

189. John Anderson

190. Joseph Waxman

191. Candice Kail, Columbia University

192. Jamie DeLine, Friends of Standing Together, NYU Alumni

193. Gurtej Gill

194. Rachel Landsberg, Smol Emuni US

195. Rabbi Sharon Kleinbaum, The Beacon

196. Annette Zygmunt

197. Lisa Grant, Hebrew Union College

198. Batya Sperling-Milner

199. Christine Miller

200. Malkah Basha Sarah

202. Angelo Spampinato 201. Marc Caplan, Heinrich-Heine University (Düsseldorf)

₽88 AL

203. Annette Gottlieb

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252. Printmaking Club, The New School
               388 AL
                                         251. Jenna Weinberg
                                           250. Jessica Brown
                      249. Jacob Solomon, Columbia University
                                           248. Virginia Linzee
                                           247. Jeanne Heifetz
                                             246. Leslie Harris
245. Sandra Howell, Affiliate of the Vermont Jewish communities
                                       244. Charlotte Ferguson
                                             243. Steve Tarlow
                                         242. Emily Engelhardt
                                          241. Todd Friedman
                                         240. Rachel Seidman
                                          239. Michael Mundy
                                    238. Matthew Lindenbaum
                                           237. Nancy Hoadley
                                             236. Leslie Harris
                     235. Jessica Hyun, Columbia University '23
                                                   234. Kate L
                                    233. George De Castro-Day
                                            232. Aliza Mamber
                                             231. Robert Fram
                        230. Caroline Shimmel, JCC Manhattan
                                           229. Elana Freeman
                       228. Jordana Jacobs, Hashomer Hatzair
                                           227. Rachael Sevilla
       226. Amber Treadway, Friends of Standing Together NYC
                                              225. Igor Tregub
                                           224. Enrique Bueno
                             223. Isabella Mundy, Bard College
  222. Lawrence Rosenwald, Wellesley College, Havurat Shalom
                        221. Ami Dube, J Street, Hunter College
                              220. Whi Mundy, Columbia, GS '24
                                           219. Eileen Chodos
                     218. Rabbi Sharon Kleinbaum, The Beacon
                                              217. Nili Belkind
               216. Susan Stein, South Carolina State University
               215. Rabbi Theodore Lichtenfeld, Orangeburg, NY
                                                214. Beth Britz
                                               213. Adam Weg
                                 212. Naomi Smidt-Afek, CUNY
                        211. Zoe Davidson, Columbia University
               210. Jack Gorman, Hebrew Institute of Riverdale
             209. Karen Shapiro, Partners for Progressive Israel
                                    LAU, euomynonA seiA. 802
             207. Rabbi Philip Bentley, Jewish Peace Fellowship
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206. Schuyler Ross, Columbia University

204. Mike Backman

205. Paul Eisenberg, Professor Emeritus, Indiana University

EXHIBIT 1-B

White River Junction, VT April 25, 2025

A reference letter for Mr. Mohsen Mahdawi

To: ldroubi@blhny.com

To whom this may concern.

We are neighbors and friends of Mohsen Mahdawi in White River Junction. We have known Mohsen since he moved to our area almost a decade ago. We also know Mohsen from his attendance at the Unitarian Universalist Church in Hartland, to which we belong. We have heard him speak in the Church and have been impressed by his eagerness to learn , and by his rightness, fairness, and good judgement in general, particularly in looking at the complex situation in the Middle East where he has lived as a young person. We are aware that he has been very diligent in learning the new language and is now fluent in English. He is an open, reliable, and hard worker in his studies at Columbia University, and is enthusiastic to learn the American culture and way of living.

My wife and I immigrated from The Netherlands in 1966 after I had received my education in atmospheric sciences at the Massachusetts Institute of Technology in Cambridge, MA. I am a retired atmospheric climate scientist of the NOAA Geophysical Fluid Dynamics Laboratory (GFDL) in Princeton, NJ, where I also taught at Princeton University. I retired after 30 years at GFDL. My wife studied social work at Rutgers University and is a retired therapist.

Mohsen is looking forward to becoming a citizen and part of the American culture. We are certain that he has been and will continue to respect the laws of our country. We can fully support him in his further work in the USA and become a respected citizen.

We declare the above statements are all true and correct to the best of our knowledge and ability."

Bindu Ovot

Sincerely Yours,

Abraham H. Oort, PhD Bineke Oort, MSW

Invoit

119 Laurel Lane, White River Junction Vermont, 05001

JA 387

EXHIBIT 1-C

Case: 25-1113, 07/14/2025, DktEntry: 107.1, Page 27 of 137 Document 46 Filed 04/29/25 Page 24 of 127

To Whom it May Concern,

I am writing to share my personal statement in support of Mohsen Mahdawi on this day April 24, 2025.

I met Mohsen several years ago when he was working at Dan and Whit's in Norwich, VT and I was making weekly deliveries there, selling granola.

After a few granola deliveries and getting to know Mohsen, he opened up and shared some of his life story with me. It was clear that he had been through so much and seen some terrible things. Despite all that, it was clear that he did not hold any resentment in his heart, I could tell he wanted to understand every human's struggle and to care for them in whatever way he could.

He would often check in with me about how my granola business was doing. He wanted to know if there was anyway he could help me to improve things, make things better or easier.

It was clear then that Mohsen was committed to peace and happiness for himself and for others, and all his actions since have emanated that commitment to peace for all.

I am so grateful today that I can send this letter in support of Mohsen. I am so grateful to know Mohsen and to know that he continues to speak the truth and to speak it with love.

I hope you consider this perspective while making your decision about the freedom of my friend, Mohsen Mahdawi.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely, Ali DeCuollo

EXHIBIT 1-D

To Whom It May Concern,

I have known Mohsen Mahdawi for 10 years, working with him at Dirt Cowboy shortly after he moved to the Upper Valley and additionally as a neighbor when he built his cabin in West Fairlee (I live in Vershire, VT about 5 minutes from his cabin).

I have never met a more calming, peaceful human being than Mohsen. The news of his arrest and detention has been devastating to our community in and around the West Fairlee/Vershire area. People with vastly differing political beliefs have all been coming together in solidarity over this.

I would implore you to release Mohsen back into his community while his cases move through the courts.

I declare that the above statements are true and correct to the nest of my knowledge and ability.

In Peace,

Amanda Helali

EXHIBIT 1-E



April 26, 2025

We, Miriam Osofsky, Madeleine Pluhar, and Katherine Paul, are the co-leaders of Upper Valley Indivisible, a non-profit, grassroots organization committed to non-violent actions to restore our democracy. We condemn the arrest of Mohsen Mahdawi, a peace-loving, kind member of our community, and a legal resident who committed no crime. He is beloved by many Jewish and non-Jewish friends in our community, and an exemplar of the most moral and courageous sort of human being. All people deserve the right to free speech. It is a caustic irony that Mohsen has been arrested in the name of "fighting anti-Semitism," when he has publicly stated numerous times that he is opposed to hate in all forms, including anti-Semitism. Mohsen said:

"I want people to know that the work and the activism that we have done was centered in the energy of love. We did it because of our love for humanity, our love for justice, our love for human rights, and I want people to know that my compassion extended beyond the Palestinian people. My compassion is also for the Jewish people and for Israel as well so people need to actually look at both sides and figure out what is the truth."

The United States is a democracy, and due process is enshrined in our Constitution. Those who claim that Mohsen is a threat to the American people are lying to our country. We demand that President Trump follow the United States Constitution and the rule of law, and release our beloved neighbor Mohsen Mahdawi.

Respectfully submitted by:
Miriam R. Osofsky
Madeleine Pluhar
Katherine Paul
Co-Leaders, Upper Valley Indivisible

EXHIBIT 1-F

To Whom it May Concern,

My name is Asma Elhuni, and I am writing to you with a full heart on behalf of someone who means the world to me—Mohsen Mahdawi, a dear and cherished friend.

I have never, in all my life, known someone more peaceful, more open-hearted, or more deeply committed to understanding and connecting with others than Mohsen. We met in 2018, introduced by a mutual friend in White River Junction, Vermont, where we were both living at the time. Even after I moved to New Jersey, our friendship has remained strong—rooted in deep respect, shared values, and a mutual commitment to justice and peace.

What stands out most about Mohsen is his remarkable gentleness and his unwavering belief in the power of love and dialogue. I want to share two stories that speak to who he is—because who he is, at his core, is love in action.

In 2018, we were both invited to speak on a panel responding to a play that many of us felt portrayed Islam in a harmful, Islamophobic way. As we prepared, Mohsen called me and said, "Remember, the people attending this play just don't know better. We need to win their hearts." That's the kind of person Mohsen is—always calling us to empathy, even when others fall short.

Another moment I'll never forget was at a rally for Palestinian human rights. Afterward, an angry Israeli man approached Mohsen with intense emotion. Mohsen didn't flinch. He didn't raise his voice. He simply listened, with kindness, and then said, "I hear your trauma. May I share mine?" And something incredible happened—the man softened. He cried. He said he had never understood what Palestinians had endured. That is Mohsen's gift: he turns confrontation into connection.

Even from afar, Mohsen continues to build bridges. While he was in New York and I was in New Jersey, he reached out to connect me with a woman—born in Israel—who lived nearby, saying, "You should talk to her. She's a peacemaker." That's Mohsen: always bringing people together, always reaching for peace.

As someone who has received awards for my organizing, including the CAIR Georgia Organizer of the Year and the Dorothy Eldridge Peacemaker Award for Human Rights (2025), I can say without hesitation: I have never met anyone more sincere in their pursuit of peace than Mohsen Mahdawi.

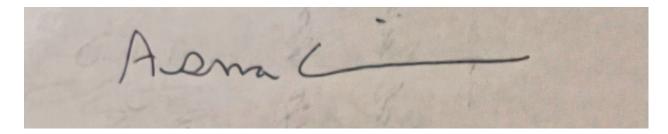
There's so much more I could share—how he helped me train for my first pull-up, how he danced with joy, how he moved through the world with softness and strength—but I won't write more here. I hope these few examples have helped to highlight the kind of person Mohsen is—a person of deep compassion, integrity, and a sincere commitment to peace.

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Please consider this letter not just as a character reference, but as a reflection of deep truth from someone who knows and deeply respects him.

I declare that the above statements are true and correct to the best of my knowledge and ability.

With sincerity and gratitude, Asma Elhuni



76 Sundance Drive

Hamilton NJ 08619

678-644-3544

EXHIBIT 1-G

April 25th, 2025

To Whom It May Concern

Letter of Support for Mohsen Mahdawi

I am writing in support of the release from prison on bail of Mohsen Mahdawi, who is being held for no good reason. He exercised his First Amendment right of speech and assembly.

We all need to exercise our basic rights so this kind of unjustified imprisonment does not happen more widely.

He is a valued member of our community, contributing in many ways to a wide range of people here in the Upper Valley. He has demonstrated compassion and a non-violent approach to difficult issues, which we model in my church community.

He is NOT a flight risk, as he is so closely connected with so many people here.

He is legally in the United States, and has been pursuing his education. He was detained in a manner that is way beyond the usual practices that we expect from law enforcement.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Barbara DeFelice 566 Sanborn Road Thetford Center VT

EXHIBIT 1-H

April 27, 2025

Hon. Geoffrey W. Crawford U.S. District Court for the District of Vermont P.O. Box 9 Burlington, VT 05042

Dear Judge Crawford,

I am writing this letter in support of Mohsen Mahdawi. I met Mohsen 10 years ago at a potluck sponsored by a member of our church, the First Universalist Society of Harvard. I was immediately struck by the contrast between the facts of his life, as I knew them (such as being raised in a Palestinian refugee camp and witnessing ongoing violence as a child and young adult) and his hopefulness and resilience. He was curious and eager to learn more about me and my life. When he heard that I teach at Dartmouth College, he became very excited and shared his hope to continue his education and earn a college degree in the U.S.

Since then, he has spoken at our church as well as at other public events. I've also kept up with his news: his work toward his degree, toward gaining U.S. citizenship, and his more recent work to give voice to the suffering that is occurring in Palestine. Always, his message has been one of peace and tolerance, and the inherent worth and dignity of all people. He has been working toward what our current administration says is its stated goal: peace in the Middle East. He should not be singled out or punished because he is Palestinian.

Mohsen is an important part of our community, and I reach out to you to ask you to allow him to return to his home and continue his pursuit of U.S. citizenship.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

Colleen Lannon

Senior Lecturer

Institute for Writing & Rhetoric

Dartmouth College

37 Dewey Field Rd., Rm 223

Hanover, NH 03755

colleen.lannon@dartmouth.edu

cplannon@gmail.com

EXHIBIT 1-I

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DECLARATION OF Nina McCampbell PURSUANT TO 28 U.S.C. § 1746

I, Nina McCampbell, declare as follows:

I write to support the immediate release of Mohsen Mahdawi from ICE detention.

My dear friend Mohsen was unlawfully and unconstitutionally detained by ICE on 4/14/25.

I met Mohsen through a mutual friend while he was working at our local general store in Norwich VT. He was helping to overhaul their computer system at the time. I am a local physician, but I have not had the opportunity to care for Mohsen medically. Anyone who has met Mohsen can attest to his welcoming smile and attitude, someone who immediately makes you feel respected and appreciated. He and I had the opportunity to socialize on many occasions, on his land in Fairlee, at gatherings in Norwich and where he was living in Hartford. At every occasion I was struck by his acceptance of all walks of life, and his active engagement and genuine curiosity of any difference in religion, sexuality, nationality etc. I would honestly walk away from each encounter thinking I had met the Dalai Lama.

Mohsen is Palestinian and a legal resident of Vermont. He was attending Columbia University to study law then philosophy and international relations. He is the most peaceful, graceful, forgiving human I know. He grew up in a Palestinian refugee camp in the West Bank and escaped after his young brother was denied access to medical care by Israeli soldiers and died, he watched his 13 year old best friend get killed by Israeli soldiers, and then his uncle was killed by Israeli soldiers. He has since lost more family members to the war and his family's homes and businesses have been destroyed. Yet he has tirelessly worked to foster understanding and peace to build bridges between Israelis, American Jews, and Palestinians, among others. He peacefully protested the war, a human right, which is far from antisemitism. He sought refuge in this country and was exercising his right to speak about his experience only to be punished for doing so.

"My experience says we are all similar and the enemy is fear. The enemy is segregation. The enemy is ignorance. And we won't be able to break through the enemy unless we have open hearts."-Mohsen Mahdawi

We need Mohsen back in our community immediately. He is the voice of reason, of peace, of community, and acceptance that we so direly need right now.

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

Executed on April 27, 2025.

/s/ Nina McCampbell, MD

Nina McCampbell, MD

EXHIBIT 1-J

April 24, 2025

To Whom It May Concern,

I am writing in support of my dear friend and fellow peace-seeker, Mohsen Madhawi. I'm a US Citizen, a PhD student at Columbia, and I've known Mohsen for nearly a year and we met during his long-standing efforts to seek allies in the Jewish community at Columbia University in an effort to establish a network of people who seek to end the war between Israel and Palestine. I write this letter to implore you to allow Mohsen to return to his graduate studies and allow him to remain in the US.

Mohsen is a ray of light in a very dark and cloudy situation here at Columbia University. We have our fair share of confused and even bad faith actors, but Mohsen is categorically a force for good. His clarity and perspective on reconciliation and peace through justice in the Israeli-Palestinian conflict as well as in campus politics guides every conversation he has. It is overwhelmingly clear from my many hours of discussion with him that he has nothing but the best intentions for all stakeholders, regardless of religion or nationality, in this deeply difficult and complex issue. Before meeting Mohsen personally, I attended events where Mohsen spoke and witnessed first hand when he helped shut down an individual who began to spew racist and antisemitic remarks on campus. Having had the chance to meet him later on and to discuss his views at length, I found him to be an earnest and diligent agent of positive change.

Our campus politics are rife with self-proclaimed revolutionaries; people who are willing to go to extremes to achieve a goal they feel is just. Mohsen is a stark contrast to them in his insistence that change is made through negotiation and compromise. It was such a relief to meet him and learn that there are voices on campus that hold such a refined and nuanced perspective on such a polarizing issue. Mohsen is always measured and keeps sharp focus on the humanity of all involved parties. He insists that a dignified solution guided by justice, international law, and collaboration is possible. His point of view is essential to a beneficial discourse on campus and the US as a whole. The revocation of his citizenship and his deportation would be a pitiful loss for our community and indeed for our nation.

I write this high praise as a Jewish student on Columbia's tumultuous campus. A student who has been disappointed repeatedly by the behavior of my fellow students and by the administration. As someone who follows our campus politics obsessively, I've seen countless instances of short-sighted, arrogant, and even maliciously ignorant decisions made and actions taken on this campus. Never once by Mohsen. There is much that could stand to change for the better on campus, and that change would best be made possible my Mohsen's continued presence in our community. One Mohsen is hardly enough for our community; we cannot afford to lose him. Mohsen is a bridge-builder and a distinctly positive influence on the community.

Mohsen's friendship has enriched my life immensely. His courage and resolve have driven me towards optimism for the future and away from despair. Though his life has been hard and full of turmoil, he holds his head high and always leads with love. He is a paragon of virtue and I implore you to release him and allow his return to Columbia where he is sorely missed and needed.

I declare that the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

/s/ Daniel Galperin

EXHIBIT 1-K

DECLARATION OF SCOTT MCGEE PURSUANT TO 28 U.S.C. § 1746

I, P. Scott McGee, declare as follows:

I write in strong support of the immediate release of Mohsen Mahdawi from ICE detention.

I first met Mohsen while he was working at a coffee shop in Hanover. I was immediately struck by his politeness and warmth, which led me to engage him in conversation. During our interaction, I learned about his aspirations to further his education. His welcoming demeanor was so remarkable that I mentioned it to my wife later that day.

Although I cannot recall the exact dates, I encountered Mohsen again at a memorial service for a close friend. At that time, he was living in Quechee and may have been working at Dan & Whit's store in Norwich. We spoke again, and he remembered our first meeting. He shared with me his plans to attend college, and while I do not recall the specific institutions, it was clear he was focused on advancing his education and contributing positively to the community.

Throughout my interactions with Mohsen, he has consistently demonstrated a calm, gentle, and open demeanor. He takes a genuine interest in those around him and is deeply respected by all who come to know him. Mohsen's presence in our community has been a source of warmth and connection. He would be welcomed back to our community for as long as needed to resolve his current immigration issues.

Based on my personal knowledge, Mohsen has strong ties to the community in Vermont and the Upper Valley. He has built a broad network of friendships through his work at local establishments and through his active engagement with community members. There is no indication that he poses any risk of flight; rather, he is committed to his education, his friends, and his life here. Mohsen is a valued and trusted member of our community, and I firmly believe he will continue to contribute positively if released.

Please send him our strong support.

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

Executed on April 27, 2025.

/s/ P. Scott McGee

P. Scott McGee

EXHIBIT 1-L

April 26, 2025

Dear Honorable Judge Geoffrey W. Crawford,

I am writing this letter as a friend of Mohsen Mahdawi.

I was first introduced to Mohsen when he came to the First Universalist Society with his Upper Valley Dad, Don Foster, in the year 2016.

After the first introduction it was evident that Mohsen cherished human connection and wanted to share his belief in striving for peace through non-violence and the belief that we are stronger together than we are apart.

In February of 2017, a guest minister, Dr. Mellen Kennedy, was to lead worship at our Hartland church reflecting on "What I Love about Islam." In speaking with Mohsen it became clear that he would somehow like to be involved in this service. As the liturgist, I had the honor and the delight to bring the two of them together. Mohsen lead the 'Lighting of the Chalice' and then shared his time of "Growing up as a Muslim." Words for lighting the chalice are usually short but meaningful. Mohsen had another idea for this service. He really wanted to do a longer 'Call and Response." Mohsen was respectful as he made his wishes clear, following his heart with the words of "Think of Others" by Mahmond Darweesh.

Another important time of my connection with Mohsen involved the documentary entitled "Seeing Through the Wall." As it stated in the film, "Many walls separate Palestinians and Israelis—walls of concrete, of mistrust, of ignorance, of fear." Mohsen wants to listen...to learn...to understand...to compromise...to share. He wants to help open hearts that have closed. He values each single life.

Mohsen is a PEACE MAKER. He has the patience to help bring out the human goodness...and he will strive to do that for as long as it will take.

May Justice prevail.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Thank you,

Dianne Rochford

EXHIBIT 1-M

April 28 2025

to whom it may concern,

MY NAME IS ERIN WALTHOUR AND I ALL WRITING TO URGE AND IMPLORE THE RELEASE OF MR MOHSEN MAHDAWI. I HAVE NOT HAD THE PRIVILEDE OF MEETING MOHSEN IN PERSON, BUT I BECAME AWARE OF HIS STURY ON APRIL 14 2025, WHEN HE WAS UNLAWFULLY DETAINED WITHOUT DUE PROCESS.

I HELPED COLLABORATE A RALLY ON APRIL 19
WHERE I HEARD FROM SEVERAL INDIVIDUALS
WHO KNOW MOHSEN PERSONALLY. WHAT I
LEARNED IS THAT PEACE IS THE CORNERSTONE OF
WHO MOHSEN IS AS A COMMUNITY MEMBER.
HE IS A BRIDGE BUILDER IN THE UPPER VALLEY AND
BEYOND.

DESPITE THE ATROUTIES HES LIVED, SEEN AND EXPLERICED HE STANDS FOR PEACE FOR ALL.

THE HEART OF THE ISSE BEING APDRESSED IN COURT
IS MOHSEN DESERVES PROPER AND FAIR DUE PROCESS.

OUR DEMOCRACY PEPENDS ON

THE ACCOUNTABILITY OF DUE PROCESS.

PLEASE AFFORD MOHSEN HIS.

AND RELEASE HIM.

THANK YOU & SINCEREM

GRANTHAM UH03753 603667 7334 JA 410 Declare the above statements are all rue and correct no the best of my knowledge

EXHIBIT 1-N

Jonathan Chaffee 21 Highland Ave. West Lebanon, NH 03784

April 24, 2025

RE: Mohsen Mahdawi vs. Donald Trump

My wife and I are members of St. Paul's Episcopal Church in White River Junction, VT and have met Mohsen and talked with him on multiple occasions there, years ago now. We were impressed then by the maturity of his compassion for those caught up in the struggle in Palestine; yes for Palestinians but also for Israelis for whom no peace is possible without an end to the war.

Mohsen is clearly a person who takes very seriously religious proscriptions about morality in the treatment of others, and is not an advocate of coercion or any kind of violence. His dedication to bringing people from both sides together to work for a just resolution to the war, one chosen not imposed, might not work, but at least does not make things worse. We know in our hearts that it is right.

This kind and profound young man is being mistreated.

I declare the above statements are all true to the best of my knowledge and ability.

Jonathan Chaffee

EXHIBIT 1-0

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Donald M. Kreis, Esq.

292 Pleasant Street
Concord, New Hampshire 03301
donald.maurice@gmail.com
603.277.0330

April 26, 2025

Re: Mohsen Mahdawi v. Donald J. Trump et al.

Docket No. 25-cv-389

To the United States District Court for the District of Vermont:

In my capacity as a citizen of the United States, as an attorney, as a public official, and as person of conscience, I am writing to urge the Court, respectfully, to grant the writ of habeas corpus requested by Petitioner Mohsen Mahdawi as well as the other forms of relief requested in his petition.

I am personally acquainted with the Petitioner by virtue of our shared affiliation with the First Universalist Society of Hartland, a Unitarian-Universalist congregation of which I am a member and on whose governing board I presently serve. I was, however, not raised in the Unitarian/Universalist faith.

Rather, because I am three-quarters Jewish by ancestry, my family required me to attend religious school at a Reform Jewish congregation. I celebrated my bar mitzvah in 1971. We were taught to revere the State of Israel and to treat as a reviled enemy a group of people who were referred to simply as "the Arabs." We learned nothing about "the Arabs" other than that they wanted to force the Jewish people out of what we were taught to refer to as "the Promised Land."

As an adult alert to world news, I now understand that the people we reviled as "the Arabs" are, in fact, Palestinians – human beings who were ousted from their homeland in what is now Israel. But, of course, this means little when one knows no Palestinians personally while identifying viscerally with the historic struggles of the Jewish people.

Thus the profound impact of having the opportunity to meet and learn from Mr. Mahdawi. Engaging with him through the First Universalist Society of Hartland has been my first real opportunity to learn directly about the lived experiences of the Palestinian people. He presents as a kind and thoughtful person, neither judgmental about nor hostile to people like me. Rather, my experience of Mr. Mahdawi is that he feels a calling to replace ignorance with understanding among New Englanders like me who are curious about his culture and his struggles. And in his interactions with his fellow members of our congregation Mr. Mahdawi radiates a love of American culture, traditions, and values.

It is therefore puzzling and, ultimately, dispiriting in the extreme that our government would treat Mr. Mahdawi as such a threat that he should neither be naturalized nor allowed to remain a lawful permanent resident, that he should be imprisoned and deported, and that he should be

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treated as a person not entitled to the protections of the First Amendment to the U.S. Constitution.

To me and my family, Mohsen Mahdawi is just like all of our neighbors – or, perhaps, all of our neighbors as we would wish them to be: friendly, peace-loving, eager to share their background and culture, and also hoping to learn about us and our experiences. I was not raised to hate anyone – certainly not Palestinians – but I am ashamed to say that for too many years they were invisible to me. Now they are no longer invisible in my world, and for a great deal of that I have Mohsen Mahdawi to thank.

Earlier in my career I had the honor of serving for three years as a judicial law clerk at the U.S. District Court for the District of Maine – the oldest federal district court in the country. I therefore know from direct personal experience how important our federal trial courts are, as front-line protectors of the U.S. Constitution and the rule of law generally. Please in this instance use your authority to restore the freedom and civil rights of Mohsen Madawi so that he may continue to pursue his noble quest to become a citizen of our great nation.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

Donald M. Kreis

min

EXHIBIT 1-P

April 17 2025

What you should know about Mohsen

I met Mohsen some 4 years ago when he became a life member of the Post Mills Soaring Club. From his camp high on the hill he has a view of the airport we fly from. I soon became friends of his, visiting his tiny home and having meals with him. He is a sweet and driven guy with the good of the world at his heart. He is also competent and driven to have sensible dialogue between people. Even though he was born in a refugee camp he does not hold a grudge. He sees the solution as people getting to actually know each other and through that understanding live peacefully together.

Henry Swayze

Tunbridge Vermont

Henry Sways

and Also a life member of the Post Mills Soaring club

EXHIBIT 1-Q

April 27, 2025

To whom it may concern,

I first met Mohsen Mahdawi about ten years ago, shortly after he arrived in the Upper Valley, at a regular Sunday service at the First Universalist Society of Hartland (FUSH). From my first encounter with Mohsen, I was impressed by his thoughtful and gentle presence. His life experience growing up in a Palestinian refugee camp is far removed from mine, yet he is a person who is generally curious to learn about other people and their life experiences. He asks questions, and he listens to the answers. He had come to the U.S. to look for a better life and to build community, and he succeeded in connecting with many folks here in the White River Junction area. I didn't see Mohsen often after he made his first few visits to FUSH, but I know that many others in the congregation stayed in touch with him. I would also, from time to time, see Mohsen in places like Dan & Whit's Store in Norwich where he always seemed to have a smile for whomever he was with.

I am not in Mohsen's close circle of friends, so I was not aware that Mohsen had received a green card or that he was pursuing a degree in philosophy at Columbia University, but I was not surprised by either of these pieces of information. I was also not surprised that Mohsen had been part of protests at Columbia University over the plight of Palestinians and the people in Gaza or that he was working toward U.S. Citizenship. My impression of Mohsen from the beginning was that he was patient, hardworking, intelligent, and a man of peace. I was extremely dismayed, therefore, by the news that Mohsen, a man we had and should continue to welcome into the United States, had been detained by ICE when he appeared in Colchester for what he had been told was a naturalization interview. The duplicitous nature of his arrest, by masked men who refused to identify themselves, is despicable, but the fact that he continues to be held without charge belittles the value of our Constitution and the Rule of Law.

The arrest and detainment of non-citizens is becoming an all too familiar tale across our country. It is appalling and alarming. I certainly hope that we, as a people, have the backbone to stand up to this brutal and unjust treatment of all people who are lawfully in our country and have been simply exercising the rights guaranteed by our Constitution. I believe that Mohsen Mahdawi is one of those who has been unjustly detained, and I urge the court to grant his writ of habeas corpus.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

Hilary Hamilton 67 Gilson Rd.

Hartland, VT 05048

Hilary Hamilton

EXHIBIT 1-R

Case: 25-1113, 07/14/2025, DktEntry; 107-1, Page 59 of 137 2:25-cv-00389-gwc Document 46 Filed 04/29/25 Page 56 of 127



Honorable Judge:

We are writing on behalf of the Sisterhood of Salaam Shalom, an organization of Muslim and Jewish women working together to promote and advocate for human rights and to end acts of hate for all human beings. Our members hold a spectrum of views on Palestine and Israel. We recognize the complexity of the issues and the passions they evoke. We endeavor to hold space to hear each other. One of the Sisterhood's core missions is to stand up to anti-Jewish and anti-Muslim bigotry, and as Americans we value the rule of law and the Constitution.

Mohsen Mahdawi exemplifies our highest ideals, rejecting violence, condemning bigotry and seeking constructive dialogue. His voice is sorely needed in the current deeply polarized environment. We are outraged that he has been arrested and detained for his peaceful political activism. We are united in our view that this action is a blow to both the Muslim and the Jewish communities and to everyone's constitutional right to free expression. Authoritarian federal overreach puts all minority communities at risk.

It also concerns us that this suppression of free speech claims to be part of an effort to fight antisemitism. Protesting Israel's actions in Gaza is not antisemitic; indeed many Jews – including many Israeli Jews – participate in such protests. Antisemitism, Islamophobia and anti-Palestinian hate are very real phenomena, and we believe that the only way to combat such hate is by working together to protect freedom of speech for all of us.

We ask that Mohsen Mahdawi be freed immediately.

Respectfully,

Leadership of Sisterhood of Salaam Shalom

We declare that the above statements are all true and correct to the best of our knowledge and ability.

P.O. Box 1162 - 1 Bala Avenue 421 Bala Cynwyd, PA 19004

www.sosspeace.org EIN: 46-4185618

EXHIBIT 1-S

April 27, 2025

To whom it may concern,

I have been a devoted member of the Hartland First Universalist Church of Hartland, Vermont for the past 25 years. Our congregants are from varied faith backgrounds including Christian, Jewish, Pagan, Humanist, Atheist and Buddhist, and come from largely a northern European heritage. I remember around 2015, Mohsen Mahdawi came to service with a church member who is a dear friend of his. After his first visit, Mohsen often attended services until he moved to New York to attend Columbia University. He was open and receptive to all he had conversations with during coffee hour after the church service.

Although I didn't have an opportunity to interact with Mohsen outside of church, when I first met him, I immediately felt at ease in his presence with his warm smile and kindness which emanated through his eyes. Although I read The Lemon Tree written by Sandy Tolan in 2006, which chronicles the Israel-Palestine conflict starting in 1948, I never had personally met a Palestinian immigrant. Through storytelling, the Lemon Tree depicts the interaction of an extended Palestinian family and extended Israelite family who had ties with the same homestead with a lemon tree which endured through time. Although The Lemon Tree gave a powerful perspective of the complex Israel-Palestinian conflict, it never mentioned the refugee camps. During coffee hour at church, listening to Mohsen talk about the atrocities he witnessed inflicted by Israeli soldiers as a child growing up in a refugee camp, I was in awe that he didn't become embittered and wouldn't have been surprised if he became hardened or radicalized. Instead, Mohsen exudes humility, internal peace, compassion, and gratitude which transcends fear. It completely aligns with Mohsen promoting peace in Palestine through peaceful, interfaith rallies while at Columbia University. Being antisemite is the antithesis of Mohsen's being.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

Jill Lloyd

Member, First Universalist Society

Hartland Vermont

EXHIBIT 1-T

Daisy Goodman PO Box 5 Lyme, NH 03768

The Honorable Geoffrey Crawford U.S. District Court District of Vermont 11 Elmwood Avenue Burlington, Vermont 05401

April 25, 2025

Dear Judge Crawford:

I am a Jewish community member living in Lyme, New Hampshire, reaching out to express my strong support for the release of Mohsen Mahdawi at his upcoming hearing before your court on April 30th.

Mohsen is a neighbor and beloved member of our Upper Valley community. I first met him when we drove together to an educational program on Palestinian history which was being held in Burlington. We had mutual friends but had never met before. During the hour and a half we spent in the car we talked about who we were and how we were coming to this program: Mohsen as a Palestinian man who immigrated to this country but still holds hope that peace and justice will come to his country of origin, and myself as an American Jewish woman who believes strongly that what Jewish people have endured in the past should *never* be used to justify the displacement of Palestinian people from their homes and land. Mohsen said that the tragic destruction in Palestine was not only hurting the Palestinian people, but also the Israelis who were causing it. I deeply respect him for being willing to see and to say that.

Mohsen is someone who lives by his ethical principles, which is clear to anyone who has an opportunity to get to know him. One of them is telling the truth, another is compassion. At this time when there is so much hatred between Palestinians and Israelis, he strives to build bridges through understanding our shared humanity and concern for all living beings. Now, more than ever, we need those who advocate for peace, justice, and understanding with us- in our communities- not abducted by masked men, imprisoned, or forcibly removed from this country without any justification. I urge you to order his immediate release and return to his community-we need him here.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincere regards,

Diasy Goodman

Lyme, NH

EXHIBIT 1-U

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John H. Vogel Jr. 24 Halfmoon Lane Williston, Vt. 05495

April 26, 2025

To whom it may concern

Letter of Support for Mohsen Mahdawi

I am Jewish. I have been a strong supporter of Israel. It may be surprising, but I have great admiration for Mohsen Mahdawi and believe he can help improve relations between Jews and Palestinians.

I first met Moshen about four years ago when we both lived in White River Junction at Hemlock Ridge. My wife, Tina Wendon, invited Mohsen to dinner and four hours later I was still entranced listening to his story. He is a remarkable young man—articulate, courageous and forgiving.

I was so proud of Isreal when I first visited in 1970. In 22 years, Israelis made the desert bloom. They twice fought off massive attacks from neighboring states and provided a safe homeland for Jews who had survived the Holocaust. While I was aware that Palestinians had been displaced, like many of my Jewish contemporaries, I believed it was a small price to pay after what had happened in Nazi Germany.

In 1992, I began a 27 year career as a Clinical Professor at the Tuck School of Business at Dartmouth. In addition to teaching classes, I took groups of students on learning expeditions around the world including to Israel. During our time in Israel, we visited Rawabi and Ramallah in the West Bank. I was horrified to discover how badly the Israelis treated Palestinians in the West Bank periodically shutting off electricity, setting up traffic stops and making Palestinians spend hours each day waiting in line to go to their jobs in Israel. So as Mohsen told his story about what his life was like in a refugee camp, it resonated with what I had personally witnessed.

What is remarkable is that Mohsen speaks without anger and bitterness. I think what he has to say is very important for Americans and particularly American Jews to hear. Too many of us cling to a 1970s vision of Israel as a small country surrounded by hostile neighbors, struggling to survive. We need to face the reality of the way Israel treats Palestinians. I believe there is great danger in blissful ignorance.

Mohsen risked his life to come to America. We used to celebrate people with that kind of courage. He went to Columbia to learn skills he could use to help his community in America and in Palestine. The world needs people like that.

I am shocked and saddened by the way the United States is currently treating immigrants. It became personal for me when they arrested Mohsen. He is a remarkable young man who

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John H. Vogel Jr. 24 Halfmoon Lane Williston, Vt. 05495

April 26, 2025

has overcome so many obstacles and achieved a great deal. We should be grateful that he has come to America. He should not be in jail.

I declare the above statements are true and correct to the best of my knowledge and ability.

Sincerely,

John H. Vogel Jr.

EXHIBIT 1-V

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Document 46

2:25-cv-00389-gwc

Richard W. Sheppe Jr. P.O. Box 81 Post Mills, VT 05058

27 April 2025

802-333-9992 rws@sover.net

> Hon. Geoffrey Crawford US District Court P.O. Box 9 Burlington, VT 05402

Dear Judge Crawford:

I am a 73 year old US citizen and resident of Post Mills, Vermont. I am writing in support of my friend and neighbor, Mohsen Mahdawi. I have known Mohsen for three years.

As with all my friends, I have shared views with Mohsen on all manner of topics, politics being only one. It is clear that the topic most important to him is peace in the Middle East.

and he knows that it is effective. He has made it his life's work, and is nonsensical to punish him Mohsen is not just a pacifist – he is a peacemaker. He has a gift for creating an environment in which adversaries can listen and learn from each other. He is happiest when he is doing this, for doing it.

government arrested him, and I am distraught by what appears to be my government's failure I was dismayed to learn of Mohsen's detainment. I was outraged by the manner in which my to respect his civil rights.

Judge Crawford, your balanced approach in this case reinforces trust in the judiciary, for all citizens. Thank you for treating both Mohsen and the government fairly. I expect an innocent man to be returned to the society that stands to benefit from his presence.

Respectfully, Redard W. Shymp

Richard W. Sheppe Jr.

I certify that this letter was written by me, and that all statements therein are true and correct to the best of my knowledge and ability.

EXHIBIT 1-W

Case: 25-1113, 07/14/2025, DktEntry: 107,1, Page 71 of 137, 2:25-cv-00389-gwc Document 46 Filed 04/29/25 Page 68 of 127

From: Mary M. Erdei 48 Laurel Lane

White River Junction, VT 05001

April 17, 2025

Re: Letter of Support for Mohsen Mahdawi

To Whom it May Concern:

My name is Mary Erdei, friend and neighbor to Mohsen at his Vermont residence when he is away from Columbia University. I am currently the Chair of the Selectboard for the Town of Hartford, Vermont (Mohsen's residential address). Also, I have been an educator for 30 years, serving 5th graders through and including college students. Now in my retirement, I serve the town instead of teaching English Literature, History and Writing. I earned a Master's Degree from Dartmouth College in 1983.

My first introduction to Mohsen Mahdawi was when he was a speaker at the Unitarian Universalist Church in Hartland, Vermont. Since this denomination has a democratic foundation, it is built on the principles of acceptance of all faiths and beliefs, cultures and the search for truth as well as respect for all individuals in their own personal searches. Lay persons like Mohsen play a strong role in furthering our understanding of different cultures, faiths and traditions. Even without being a member of the UU Church, Mohsen espoused our values while educating us about his youthful experiences of living in a Palestinian refugee camp where he witnessed atrocities like the death of his best friend. Other friends and relatives' deaths would follow over time. Yet Mohsen spent HIS time that day helping US to understand what it was like to be in his country, in his culture. After his talk, he listened to us, encouraging us to share our stories. His message always came back to trying to find peace through non-violence.

Years later, when I moved from NH across the river to Vermont, Mohsen became a neighbor, living with one of my former high school students. He was now a student at Columbia, where he worked toward a degree in Philosophy, becoming a scholar as well as working a job. He had a passion for trying to make the world a better place for all people, trying to enjoin people to recognize human rights for all. He tried to open people's eyes to the value of dialogue and organized <u>peaceful</u> protests. He worked with interfaith groups and even Jewish groups. He would talk to anyone who would listen....and, in turn, he would listen to them.

One experience I draw upon because we live in a close-knit community (and I was privy to this as a confidant of my neighbor): the president of her Homeowners' Association where Mohsen lived was having some difficulties with his flat mate. The situation was making some of the residents uncomfortable. Eventually she decided to ask Mohsen to intervene and mediate a conversation between the two. Mohsen was calm, empathic, and understanding, guiding the dialogue to a healthy and acceptable conclusion. This is the kind of man Mohsen Mahdawi is...and will be.

He loves this country, the friends he has, and the rural community he lives in. He values Vermont's ways and the natural world in his life. He has an energetic dog (Sage) that I have walked for him since the dog would not thrive in the city. Mohsen is not a flight risk as this has been his home for a long time. The emotional toll of not being with a community of scholars, peers and friends will be a hardship for him as well as for his physical well-being. I observed this when he invited friends to come to his home to witness the solar eclipse last year.

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Mohsen should be released and should have full due process. He is a legal resident of our community and has the right to pursue a Master's degree program that he has been accepted into.

I declare that the above statements are true and correct to the best of my knowledge and ability.

Thank you for your consideration,

EXHIBIT 1-X

Dear Judge Crawford,

I am writing to you today as a father and elder. Mohsen often refers to me as "Brother Michael, my spiritual father". I have known Mohsen for the 10 plus years since he came to our country seeking freedom and higher education. He even spent time living with me and my family and is like a big brother to my daughter. In all these years that I have known him, he has had a vision of peace between Israel and Palestine. I have only ever heard him say in my presence caring, compassionate and loving words. One of his love languages is to cook and feed people lavish meals. He loves to bring people together from "both sides of the aisle" to share a meal and talk, connect and deeply listen to one another. He makes sure that everyone's voice is heard in the room and will politely interrupt someone if they stop someone else from speaking or if they speak harshly about another. Why? Because as a Buddhist practitioner he tries to evoke peace, equanimity and compassion where there is "no other".

My and many hearts in our community are broken and filled with grief at his unlawful detainment. As you know Vermont has been his home for the last 10 years, except when he attended Lehigh and now Columbia University. He has land here that he loves with his tiny cabin, fire ring and trails where he can walk, sit and meditate. It brings peace to him and that little one who witnessed unimaginable horrors as a child growing up in the refugee camp in the West Bank.

I no longer live in the Upper Valley but since being here I have been staying at his apartment in Wilder and sleeping in his bed. Please let us bring my godson home on Wednesday so he can sleep in his own bed and be with those of us that love him.

Peace, Light and Love

Michael Denmeade

aka Brother Michael

EXHIBIT 1-Y

Dear Judge Crawford and who this may concern,

Warm greetings to all who read this letter on behalf of Mohsen Mahdawi. My name is Carolyn Griffeth and I serve as a spiritual minister in Missouri and beyond. On several occasions, I have had the honor to hold space for Mohsen as he reflected upon the call of his soul. I wrote the following letter called "Who I know Mosen to be" to people in my congregations when Mohsen was abducted by ICE. I share it with you now as my testimony to Mohsen's impeccable integrity and commitment to TRUE non-violence rooted in love, empathy, and respect for all.

With prayers for justice, Carolyn Griffeth

Who I Know Mohsen to Be

This is no eulogy. I imagine Mohsen fully possessing his inner-agency even while he is being held in a maximum security prison in Vermont and facing the most preposterous and distorted of allegations. I see him there befriending the prison guards through his graciousness and alchemizing his pain and outrage through loving kindness meditation. I imagine him praying for justice and peace and ongoing self-purification and turning to his deep studies of nonviolent leaders such as Martin Luther King Jr., Gandhi, and Nelson Mandela for strength and guidance.

I trust he can feel all of our love pouring out towards him. And in return, I imagine he is channeling this love back out to the people of Palestine and Israel-including to the Israeli soldiers.

This is the Mohsen that I, and myriad others, know and love.

I met Mohsen six years ago through my partner Michael, who is a father to Mohsen by chosen family. They met at a Unitarian Universalist Church in Vermont when Mohsen was a recent immigrant from the West Bank and struggling with night terrors from PTSD. Michael volunteered to stay the night for several days with Mohsen in his apartment to support him to be with the terror that plagued him. Beginning in this way, they gradually came to know each other as family.

On three blessed occasions, I have had a chance to hold space for Mohsen as a soul guide alongside Michael. The most recent time was last fall when we visited Mohsen at his off-grid tiny house on a Vermont mountain top where he lives part-time when not studying at Columbia University. Here he shared his deep soul-calling to peace making on behalf of the people of Palestine and Israel, which asked him to do the deep work of transforming all that isn't love within. As we listened to Mohsen with a view of Vermont's rolling mountains before us, it seemed to us like the Earth herself was responding to and reflecting the vast magnitude of his being.

The Sanskrit word <u>Satyagraha</u>, roughly translated as truth force, is the only word I can find to describe the gravity of Mohsen's presence that day. Satyagraha is built on the belief that truth and love are more powerful than violence. It involves:

- **Non-violence:** Refraining from physical or emotional violence, even when faced with aggression.
- **Truthfulness:** Remaining true to one's conscience and beliefs, even when it's difficult.
- **Courage and Suffering:** Being willing to endure suffering and hardship to uphold one's truth.
- **Self-transformation:** Working on oneself to become a more truthful and loving person.

This describes the Mohsen who we know and love, and who the world is also coming to know and love.

EXHIBIT 1-Z

April 27, 2025

To whom it may concern,

I am writing to urge for the release of Mr. Mohsen Mahdawi. I have not had the privilege of meeting Mohsen personally but I became aware of his story on April 14 when he was unlawfully detained without due process. One of my friends informed me about what happened and I watched a video and saw it on the news. I am deeply concerned about people being detained without due process.

I helped collaborate a rally where I heard from several individuals who know Mohsen personally. I learned that peace is the cornerstone of who Mohsen is as a community member. He is a bridge builder who has seen great atrocities but has stood for peace for all.

Despite the issues at hand being navigated today by all parties, the heart of this issue is that Mohsen deserves due process. Without the cornerstone of due process for human beings our democracy will crumble.

Mohsen stands for peace and is a valuable member of our community. Please respect the laws of the land and the rights of Mohsen by giving him his rightful due process and freedom.

Thank you and sincerely,

Julia Neily

Lebanon, NH

"I declare the above statements are all true and correct to the best of my knowledge and ability."

EXHIBIT 1-AA

April 26, 2025

Dear Honorable Judge Georffrey W. Crawford,

I am writing this letter in support of Mohsen Mahdawi's release from prison.

I have not met Mohsen, but I know him through my Mom, Dianne Rochford, who is a long-time, active member of the Hartland Unitarian Universalist Church in Hartland, VT.

Though I don't know Mohsen personally, I hope you will still read my letter. I have dedicated my career to helping those affected by domestic violence and sexual assault. I have spent more than three decades helping to prevent bullying and abuse by teaching healthy relationships skills to youth in schools. I believe in the universal human right to safety and respect. And because of this, and my fear of the ramifications of the bullying I see throughout our government, I am compelled to write to you.

My Mom worked closely with Mohsen to plan a service at their church. Through this experience, she and Mohsen became friends and have corresponded over the years. Together they helped bring awareness of the documentary "Seeing Through the Wall" to their church and the greater Upper Valley area. This documentary sheds light on what can happen when Jewish and Israeli people see each other as humans, with shared hopes and fears and dreams for themselves and their families.

As you likely know, Mohsen escaped Alfara'a Refugee Camp in the West Bank by climbing the wall; a most dangerous move to try to find freedom.

Mohsen is a legal resident with a green card and his home is in White River Junction, Vt. Mohsen is a peace-maker. He raises awareness about basic human rights and the power of non-violence to make lasting change. It is a bitter irony that he is facing persecution for his beliefs in the very country he fled to for freedom.

Mohsen has not been charged with any crime. I am writing with great hope that you will recognize that peaceful protests and freedom of speech are hallmarks of our country and of democracy in general.

If judges and our justice system are pressured by politicians to deny those basic, fundamental rights to individuals legally in this country who are not charged with any crime...I fear for ALL Americans that our democracy could be fatally wounded.

Thank you for taking time to read my letter. I remain hopeful that the judicial branch of our government can stand strong for democracy.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Thank you,

Kerry Rochford Hague

emg Rodford there

Newport, NH

EXHIBIT 1-AB

April 27, 2025

Your Honor,

By way of introduction, my name is Isabelle Hazar; I am a Barnard College of Columbia University alumna, Lebanese by heritage and a proud New Yorker (born and raised)! Since my graduation from Barnard in May of 2023, I have been working in anti-money laundering for various financial services companies.

I am the daughter of two immigrants who were granted the privilege of moving to the United States after a life in Lebanon became unsustainable. Each of my parents came here with close to nothing, financially speaking, but because the United States is a land of opportunity, they've been able to build themselves up, get married, start a family, have two children whom they fed well and sent to good schools, and give back to the poor. Because of the prosperity they've been able to experience as a result of living here, they instilled within their children, my younger brother and me, a deep appreciation for the United States and an understanding of the importance of giving back to this country.

Political contention is no stranger to the United States, but in recent years, we've seen a manifestation of it that has bred stalemates that result from stubbornness, isolation that results from intransigence, and even harm that results from hatred. Individuals who can mobilize communities in support of reaching across the aisle to those who think differently from us in search of peaceful solutions are a rare breed in these times. Mohsen is an example of one of these rarities.

I met Mohsen at an accepted students' event for a prestigious American law school –
neither of us had even applied to law school at the time, but the event was open to guests, so we
each took our opportunity to go. My first impression of Mohsen, and my impression of him to

this day, is that he is someone so fascinated and inspired by the possibilities that are available to those who live in the United States, as demonstrated in part by his academic interest in American law. I was also struck by the way he carried himself; he spoke eloquently, stood confidently, and managed to make me feel impressed by and safe with him at the same time. On a deep level, it takes a special kind of person to be able to do that.

Something I've learned from life is that there is no more thorough and true way of being American than exercising the rights this country bestows upon us. Among the most fundamental of these rights are embedded in the First Amendment to our Constitution – it's first for a reason! Mohsen's exercising of these rights is an indicator of how little of the American dream granted to him he was willing to waste. Mohsen's path is a fantastic example of some of the best parts of the American way of being - he came to this country with the understanding that it's a great place with great possibilities, but not only that. He did not come to the United States with the expectation that he was going to strike lucky and get to live an easy life without giving back. He came to the United States with the wholehearted desire to immerse himself into the very fabric of this country - its law - and to work with it, to meditate on it, to utilize it to help those who are less fortunate than he. And that's precisely what he was doing - peacefully and mindfully exercising his right to stand up for the human rights of others. Dissent is patriotic because dissent is rooted in the fundamentally American desire to protect ourselves and one another from threats to life, liberty, and the pursuit of happiness. As far as I'm concerned, Mohsen is an American patriot.

I remember talking with Mohsen about one of his favorite writers, Mahmoud Darwish, a Palestinian poet. Since Mohsen's detainment, I've been thinking a lot about one particular Darwish quote: "We still live as if death mistakes us. We – who are capable of remembrance –

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are capable of liberation." I've been thinking about it specifically in conjunction with another quote, this time, by Benjamin Franklin: "Energy and persistence conquer all things." I think it's remarkable that across time and space, advocates for liberation from oppression have spoken consistently to the humanity, the human qualities, that it requires to achieve liberation — in this particular case, from Darwish and from Franklin alike, we learn about the importance of perseverance. It seems we're not so different from one another after all.

From the depths of my heart, soul, spirit, and mind, Your Honor, I implore you to see the value Mohsen Mahdawi contributes to the United States of America and to take action against his deportation.

I declare that the above statements are all true and correct to the best of my knowledge and ability.

Respectfully,

Isabelle Hazar

elsabelle Atompo

EXHIBIT 1-AC



FIGURATIVE WORKS / PORTRAITS / STILLS & SCAPES / MURALS

To whom it may concern:

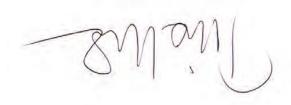
Mohsen was my neighbor, he is also a friend.

He lived just four doors down in a small enclave of homes in White River Junction, VT. Our homes backed into the same forested hillside. I remember Mohsen emerging from the woods with an armful of wild mushrooms and a joyful smile. He love the outdoors. He was drawn to our peaceable but brave, little state and made it his home. He cherished the place so much, he worked hard and saved to buy himself a little piece of land. Mohsen is brimming with love, not just for the wilds of Vermont but for this world, for all of humanity. We would talk at length and in great depth about his dreams. He knew the anguish and suffering of war first hand—his losses were very great—and yet, Mohsen is an activist only for peace.

My mother's ancestors arrived in America on the Mayflower, deported from England for their religious beliefs. My father was an Ashkenazi Jew and fled Nazi persecution. They met when he was at Harvard and she was at Wellesley. Both went on to teach and eventually became educational publishers. The takeaway from their merged stories? When nations sow hospitality, they reap productivity.

Mohsen is a brilliant young man, bursting with the kind of potential this country could use, especially at this pivotal moment—in America's history and in our shared future.

I declare the above statements are all true and correct to the best of my knowledge and ability.



Tina Wendon President, Board of Directors CraftStudies Studio & School

 $\mathbf{A449} \\ \mathbf{A60}. \\ \mathbf{A703} \\ \mathbf{A709} \\ \mathbf{A7$

EXHIBIT 1-AD

Mohsen, he's a genuine gentle man. I first met Mohsen while I was working at Supercuts. He sat in my chair and apologized for his English but said he was working really hard to get better. I found no issues communicating with him he is always smiling. We chatted about his experiences thus far being in the US he told me he was from Palestine and commented on my tattoos how he thought they were amazing artwork and that he wanted to get a tattoo of a poem in his native language I told him I'd

reach out to my tattoo artist. They got acquainted. And Mohsen got the tattoo he wanted. He was so thankful he invited me and our tattoo artist over for dinner to thank us both. He cooked a wonderful thoughtful meal and had made a charcuterie board of various cheese and crackers. We sat and talked for hours with Mohsen laughing about his first experiences here and how welcomed he felt in this country and the peace he felt being here. He also mentioned how grateful he was to be able to study here.

I went on to cut Mohsen's hair for a couple of years when he decided to expand his mind and move to attend college in another state he came back a few times to visit and made it a point to stop in and for a haircut and a visit. What is happening to Mohsen is very wrong. He is a man of peace and equality and he would not treat any stranger as beneath himself. The love he has for his family and his home are pure and solely out of love for his people. I've known Mohsen to be nothing but kind and peaceful and seeks to bring

peace to all people he embraces.

I Declare the above statements are all true and correct to the best of my knowledge and ability

Sabrina Rowell



EXHIBIT 1-AE

To whom it may concern:

I am a resident of Hartland, Vermont and Iwrite to express my dismay at the unlawful detention of and lack of due process for Mohsen Mahdawi, a resident of White River Junction, Vermont. Mr. Mahdawi had been living in the U.S. for nearly a decade and was in the last steps of becoming a citizen when he reported for a citizenship interview and was then taken away. The government has so far failed to provide any evidence against Mr. Mahdawi that would justify his deportation and the removal of his legal resident status. That he is still being held despite the fact that no evidence has been produced defies logic.

If the evidence against him is related to his participation in protests at Columbia University, then the government must show that Mr. Mahdawi's actions created harm to the United States. In fact, my understanding is that Mr. Mahdawi, in the course of exercising his rights to free speech guaranteed under the constitution, pushed back against antisemitic comments made by some protesters and pulled back from the Columbia protests when he came to believe they were not in keeping with his philosophy of nonviolence. He has formed so many meaningful relationships in our community in the time he has been living here and built bridges across communities by telling his story of growing up in the West Bank and advocating for nonviolent solutions. My connection to Mr. Mahdawi is through local communities of faith. I have been so impressed with his commitment to overcoming division and talking across ideological differences.

This illegal detention is antithetical to the principles of the United States I know and love. If a man who has been living in the United States for ten years and has contributed so much to his communities can be denied due process and detained indefinitely without evidence of wrongdoing, then none of us are safe or free. Mr. Mahdawi must be released and given due process.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sarah Taylor, Hartland, Vermont

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About Mohsen Mahdawi:

Four years ago Mohsen Mahdawi joined our gliding club (near his cabin in West Fairlee). I served as one of the volunteer instructors on his training flights in a glider. From our interactions at the club's social occasions I learned to appreciate his dedication to peace and tolerance. I am Jewish and grew up in Israel, and Mohsen remarked that an Israeli teaching a Palestinian to fly was a wonderful break from the Middle East conflicts. Accusing him of antisemitism or support of terror is completely incongruent with the Mohsen I got to know.

I declare the above statements are true and correct to the best of my knowledge and ability.

- Moshe Braner, Essex, Vermont

EXHIBIT 1-AF

To Whom It May Concern,

I am Laura Simon, a resident of Hartford Vt for the past 20+ years and a resident of Vermont the past 50. My professions as a social worker and as a special educator include extensive assessing of all kinds of people in all kinds of situations.

I have not had the opportunity to get to know Moshen Mahdawi directly but many people in my community who I have worked closely with, who are well respected members of the community and who I totally trust, tell me Moshen is a peaceful bridge builder. Like me, he was a student activist and has spoken out against injustice.

Moshen was abducted, detained, and threatened with green-card cancellation and deportation. He was targeted because he spoke out against the war in Gaza. This is infringement of his First Amendment right to free speech allowed

to all, regardless of citizenship status. And, we know that when a peace-seeking bridge builder such as Mohsen can be abducted by masked and hooded men from the federal offices where he was to take his citizenship test, none of us—regardless of our nation of origin and citizenship status—is safe.

Mohsen is a beloved voice of peace and justice in the Upper Valley. I stand with Moshen and the mutual respect and dignity he has created. I am frightened and outraged by his jailing. I call for Mohsen's immediate release, expungement of all charges, and a clear

and speedy path to the completion of his application for U.S. citizenship.

I declare that the above statements are true and correct to the best of my knowledge and ability.

Sincerely,

Laura Simon, LICSW, CAS

EXHIBIT 1-AG

Mohsen Mahdawi was a part of the congregation at the UU Church I attend in Hartland, VT. He was a presence! I loved greeting him as he would come in to find his seat. He was gentle, smiling, happily sharing his greeting. He made me feel special as he called me by name. We'd talk briefly, and I was always left happy to know him, happy that he was coming to church regularly, happy that he was in our country.

He is a very special, unforgettable man. He has an aura about him that is comfortable, welcoming, and loving. He speaks thoughtfully, with understanding. I would never expect that this kind man had ever gone through all he had in his youth. He was without hate. Mohsen just wants peace and a place for his people and he seeks it through working with both Palestinian and Jewish friends.

His impact for good is great. Our country needs more people like Mohsen and the world does, too.

I declare that all statements above are true and correct to the best of my knowledge and ability.

Nancy J. Pedrick

EXHIBIT 1-AH

DECLARATION OF Noelle G. Vitt PURSUANT TO 28 U.S.C. § 1746

I, Noelle G. VItt, declare as follows: I write to support the immediate release of Mohsen Mahdawi from ICE detention.

Mohsen is well known for his voice of reason, for his mild nature and for being a well respected and caring member of our community who is law-abiding and trustworthy. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 27, 2025.

Noelle G VItt

Jaille GY: [Noelle G VItt type your name here as well below the line]

EXHIBIT 1-AI

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Letter of Support for Mohsen Mahdawi

I am writing this statement in support of Mohsen Mahdawi, a US green card holder who was recently detained while reporting for his US citizenship exam.

I am a long-time resident of the Upper Valley and work at Dartmouth-Hitchcock Medical Center as a Pediatric Neurologist (MD); I am on the faculty of The Geisel School of Medicine at Dartmouth and a Professor of Pediatrics and Neurology.

I first met Mohsen in 2013 when he was living in the Upper Valley and working as a bank teller while trying to get into college. He was a kind, soft-spoken individual with a difficult past, being Palestinian from the West Bank.

Mohsen came to Hanover Friends (Quaker) Meeting and always espoused peace and non-violence. He promoted bridge-building despite the prevailing political climate which undermined the human rights of Palestinians and their right to self-determination. He adored the US and valued the freedom he found here. He hoped to become a citizen and contribute to our nation. I do know from an article in the newspaper that Mohsen subsequently bought a piece of land in VT and hoped to settle there someday. I also know that he was studying at Columbia University NYC from the same article, published a few years ago in the Valley News. Although I have not had any contact with Mohsen for >10 years, I do support his constitutional right to free speech and that making him part of a political witch hunt when he has committed NO CRIME is WRONG and should not be allowed in this great country that we have, one that guarantees the right to free speech in our Constitution.

Richard P. Morse, MD

"I declare that the above statements are true and correct to the best of my knowledge and ability."

EXHIBIT 1-AJ

Simon Dennis 149 Latham Works Lane White River Junction, VT 05001

April 17, 2025

To Whom It May Concern,

It is my honor to write about the character and qualities of a dear friend and a man I greatly admire, Mohsen Mahdawi. Mohsen and I met in 2016 when I was serving my fourth of nine years as a member of the Hartford Selectboard and was working as the director of The Center for Transformational Practice, a nonprofit organization that hosted gatherings, talks and conferences. Much of this work was inspired by global thought leaders such as Gandhi, Nelson Mandella and Aung San Suu Kyi, who embodied a commitment to inner transformation as the foundation for positive social change

Upon first meeting, I was struck by the depth of Mohsen's commitment to nonaggression and his capacity for maintaining an attitude of nonopposition in the face of conflict. I knew immediately that his voice carried a depth of understanding far beyond his years. I felt the presence of the kind of leadership I had come to know in the great leaders that had inspired the work of the organization I was attempting to lead.

These conversations proved to be the beginning of a dynamic partnership and profound friendship that has endured to this day. It was not long before he and I had scheduled some speaking engagements for him at a local senior center. At these events, Mohsen was always able to fascinate audiences with stories of the world he had grown up in and send them home inspired with a vision of peace through healing, reconciliation and mutual understanding.

Since then, Mohsen has spoken at hundreds of venues. At these public presentations, several of which I have had the good fortune to attend, I have always felt that Mohsen is gifted with the miraculous ability to rise above his own loss and suffering to exemplify a vision of peace that does not take sides, but rather holds to the best outcome for everyone involved.

On March 12, 2024, Mohsen spoke in Santa Barbara, California. At the end of his lecture, he spoke in a way that seemed to ignore conventional distinctions. "I see my pain in their pain, the Israelis' pain." he said, "I see my trauma in their trauma. I see my healing in their healing. And the solution moving forward, in the solution for them as well. And we have to reconcile this reality. We can't hide any more behind it. So with this vision that I have, and understanding about pain and trauma, I have centralized my focus that my activism is for humanity, for freedom and for liberation. And I believe that equal rights have to be applied

for all. And children have to have the same opportunity, both Israelis' and Palestinians don't deserve to live in fear and trauma anymore." I understand these words to capture the essence of Mohsen's philosophy.

When one considers the losses Mohsen has sustained due to the actions of the Israeli military; the loss of his brother, his best friend, his uncle, five cousins, and many others, it is amazing to recognize that Mohsen's most basic approach to the resolution of the conflict no longer seems to pick a side. As he says, his activism has come to be for all of humanity, that is, for both the Palestinians and the Israelis.

As one could imagine, this level of high mindedness, even coming from a voice with the authority and authenticity of Mohsen's, did not play well in the culture of undergraduate activism at Columbia. At the worst times, Mohsen was viciously attacked simultaneously from both sides. Due to his effectiveness as an organizer, he was labeled with the disingenuous accusation of antisemitism by those who supported Israel's perspective in the conflict. In contradiction to this, he was accused of being an apologist for Israel by those with whom he was building the movement. As his message had risen above the level of dialogue at Columbia, Mohsen found himself at times without a strong community of allies.

But so strong is Mohsen's conviction that, as he put it, "The human being is not an enemy; the enemy is fear, segregation and ignorance" he has to this day not backed down from his core message of peace through mutual understanding. In short, Mohsen possesses the rare leadership that is always present when an individual exerts a world-changing influence to support peace in a time of war. Sadly, all too often, structures of societal power have moved to persecute, incarcerate, and ultimately murder the messengers who bring forward this kind of challenge to the status quo.

When they do, history does not treat them kindly. I trust that you will take the time to evaluate what sort of man Mohsen Mahdawi is by reviewing the lectures and interviews that are readily available. Please act with conviction to allow him release on bail for the duration of the judicial proceedings.

I declare that the above statements are true and correct to the best of my knowledge and ability.

Sincerely,

Simon Dennis

Chair of the Selectboard of Hartford, Vermont, 2017-2019

EXHIBIT 1-AK

Dear Judge Crawford,

My name is Lily and I am a 29 year old VT resident. I grew up in the Upper Valley as an only child, with my parents Michael and Kelly. I met Mohsen Mahdawi back in 2015, when he stayed with my family while attending his Dartmouth College classes. Mohsen and my dad during that time grew a bond that can only be described as a father son relationship. Mohsen also calls my dad his chosen godfather. Despite there being an almost 20 year age gap between them, I watched Mohsen and my dad become best friends. They spent their time together in meditations, indigenous ceremonies, attending services at the UU Church in Hartland, getting together with friends for Seder dinner. The list goes on! Not to mention Mohsen Vs. my mom cook offs that would happen at our house. My mom who hasn't met a food spice she doesn't like, LOVES Mohsen's cooking. Especially his famous Maqloobeh a Palestinian rice dish that he would make vegetarian for my mom and I. I have so many amazing memories of staying up late with my family and Mohsen eating food, listening to music, watching movies and documentaries and him helping me with college essays.

Mohsen Mahdawi is a part of my family. And I know this for a fact because of the pain I feel in my heart every day that he sits Northwest State Correctional facility. Please from the bottom of my heart understand that this is a peaceful man, who is deeply connected and loved by his VT community.

On a personal note. I'm getting married in July and to not have Mohsen there would be not like having my brother present.

Thank you and sincerely,

/s/ Lily Denmeade

Lily Denmeade

EXHIBIT 1-AL

Dear U.S. District Judge Geoffrey W. Crawford:

I write on behalf of Mohsen Mahdawi, a friend I have known several years as we both attend the Unitarian Church (First Universalist Society of Hartland, VT).

Mohsen Mahdawi, a Patlestinian refugee, came to the United States legally more than a decade ago and has lived and worked in Vermont and New Hampshire and is currently finishing his Bachelor's and and beginning a Master's degree program at Columbia University.

Two weeks ago he was called to attend a meeting in Vermont "to work on his path to US Citizenship" and during that meeting he was abducted by four men wearing masks and hoods. His lawyer, a Vermont legislator and a former US State Department diplomat who is a friend and mentor were outside the building, as well as an Upper Valley journalist, all of whom witnessed the abduction.

A law-abiding, legal guest of our country was lied to and taken away in handcuffs with no explanation.

No one knows what charges are being made against him.

Mohsen Mahdawi is a man who exudes peace and kindsness and attended some peaceful demonstrations while at Columbia. He is not an anti-Semite. As he has pointed out, as a Palestinian, he, himself, is Semitic. He has worked to bring both sides together and calls us all brothers and sisters. He has been interviewed on 60 minutes and the BBC and featured as a model citizen in the Valley News that serves the Upper Valley of New Hampshire and Vermont.

He was raised in a Palestinian refugee camp in the West Bank and has known deprivation and experienced the deaths of family and friends as well as the devastation of his country. He wants nothing more than pieace and has worked tirelessly for mutual respect and understanding between all the warring factions. He has never supported violence or evil for evil. He simply wants to find a way to end this genocide and destruction and to help build a coalition between those who disagree.

Mohsen Mahdawi is articulate, intelligent and intensely compassionate and he is what the world needs. Especially now.

Bernie Sanders is aware of the situattion. We ask how protesting for peace and demonstrating against genocide could possibly be crimes in our United States and hope for his release and protection from deportation so that he can finish his studies, become a U.S. citizen and continue to work for peace. We need him. The whole world needs him. And more like him.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my ability.

Sincerely,

/s/ Patricia Whitney

Patricia Whitney

EXHIBIT 1-AM

DECLARATION OF Paul D. Manganiello PURSUANT TO 28 U.S.C. § 1746

I, Paul Manganiello, declare as follows:

I write to support the immediate release of Mohsen Mahdawi from ICE detention.

This letter was sent to our three Federal legislators and our Vermont Senator Becca White. We declared that the following statements are true and correct, to the best of our knowledge and ability.

Dear Becca.

We would like to thank you for accompanying Mohsen Mahdawi to Colchester, when he was supposed to appear for his citizenship interview, only to be illegally abducted by ICE.

We live in Norwich, we first met Mohsen shortly after he arrived in the Upper Valley. He came to a function that our Church was sponsoring. He impressed us by his calm demeanor and his sincerity in getting to know our Upper Valley communities. He loved his new home, working at Dan and Whit's in Norwich while being befriended by the owner Dan Fraser. He even went on to purchase property in Thetford; this was all before he decided to enroll at Columbia University.

As you and the other member of the Vermont delegation, stated, this is not only a sad day for Vermont, it is a sad day for the Nation. There is no longer any rule of law in this country. If Trump pursues his lawless agenda and it precipitates a constitutional crisis; and if congress doesn't intervene and he ignores the courts; the only other recourse is impeachment and as you know that failed twice with his last term. We are sure that you are very despondent over the current situation we find our State and Country in.

In the meantime, we need to find a way to support Mohsen. Please keep us informed of what is happening and how we might be able to bring pressure on the "The Powers that Be". Again, we are very proud of the response you and our legislators have given at this time.

Paul and Wendy Manganiello 226 Turnpike Rd. Norwich, Vermont 05055 802-390-3828

[Paul Manganiello MD MPH Volunteer Medical Director Good Neighbor Health Clinic WRJ, Vermont

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

Executed on April 28, 2025.

Paul Manganiello Paul Manganiello

EXHIBIT 1-AN

DECLARATION OF CARMEN T MCCAMPBELL PURSUANT TO 28 U.S.C. § 1746

I, Carmen T McCampbell, declare as follows:

I write to support the immediate release of Mohsen Mahdawi from ICE detention.

I am a retired Vermont Learning Specialist/Consulting Teacher who worked in the Norwich School District for about 20 years. As a regular at our local general store, Dan & Whit's, it was my absolute pleasure to meet Mohsen there about 10 years ago. He was working there, helping to upgrade the store's computer and billing systems, and had become a good friend of the Fraser family who are the owners. Mohsen was always a welcoming presence and easily made friends with many people in town and nearby. We were all thrilled for him when he, after a couple of years working here, was accepted to Temple University, went there, and continued to call Norwich and White River Junction (where he lived with a friend) his home. Eventually he transferred to Columbia University, and he has continued his commitment to our Upper Valley community by buying land just north of Norwich. My friendship with Mohsen was very casual, but he became a good friend of our daughter Nina McCampbell, MD, and several of her friends, and they were often at gatherings together including at her home. Without exception, all of us who have known Mohsen hold him in the highest regard and with total respect for his kindness, compassion, and willingness to engage with people of all types, ages, and religions. In many ways he is a model for us all as an ambassador for peace and understanding. It is my deepest wish that we can embrace him again in our community; it will be a joyous welcome back.

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

Executed on April 27, 2025.	
//G	
/s/ Carmen T. McCampbell Carmen T. McCampbell	

EXHIBIT 1-AO

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DECLARATION OF JUDITH BERNARDINE HERTOG PURSUANT TO 28 U.S.C. § 1746

I, Judith Bernardine Hertog, declare as follows:

I write to support the immediate release of Mohsen Mahdawi from ICE detention. I first met Mohsen Mahdawi some seven years ago, when he started working at Dan & Whit's, our local grocery store in Norwich VT. We struck up a conversation and discovered that we were both from the same place: I am from Israel while he is Palestinian. After a conversation in which we shared our regrets about the difficulty of creating peace in our homeland, we exchanged emails. My interactions with Mohsen convinced me that he is an exceptionally friendly a peaceful person who, like myself, strongly believes in a peaceful resolution of the Palestinian-Israeli conflict. He is definitely not violent, anti-Semitic, or a supporter of terrorism.

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

/s/ Judith Bernardine Hertog

Judith Bernardine Hertog

EXHIBIT 1-AP

April 27, 2025

270 Orizzonto Road White River Junction, VT 05001

To The Honorable Geoffrey W. Crawford,

We have been residents of White River Junction for more than 25 years. We own small businesses here and are involved in town government, in both elected and volunteer positions.

We first met Mohsen Mahdawi in 2016 at a fundraiser for a local non-profit community-building organization, Vital Communities. We have since come to know him as a beloved member of our community, the kind of person who, after just a few hours together, feels like a brother and a son. Since his detention on Monday, April 14th, we became even more aware of how widely loved and respected Mohsen is by people throughout our community for his kindness, generosity, curiosity, and commitment to peace.

We urge the court to keep Mohsen in Vermont, his home jurisdiction, and to release him on bail at the earliest possible opportunity while legal proceedings unfold.

We declare the above statements are true and correct to the best of our knowledge and ability.

Sincerely,

Charles Wooster

Susan Kirincich

EXHIBIT 1-AQ

FROM THE DESK OF

Robert E. Pitiger

April 26, 2025

Robert E. Pitiger
1 Hazen Street
Norwich, VT 05055-9350
Email: rpitiger@gmail.com
Mobile: 802-2997745

To whom it may concern:

Mohsen Mahdawi is worthy of the court's support and is in my opinion, being held by the US Government in St. Albans VT unjustifiably without charges of wrongdoing and without due process for exercising his 1st Amendment right to free speech.

I am a 28 year resident of Norwich, VT, born in the Bronx, NY. I am currently retired after almost a 30 year career on Wall Street as a municipal bond trader and underwriter. I served as President of the Norwich Public Library Board for a number years and currently I am serving a two year term as an elected Justice of the Peace for the Town of Norwich. I also served in The US Army Combat Engineers for three years from 1967-1970 and was honorably discharged as a 1st Lieutenant.

I met Mohsen a number of years ago at a dinner organized by a friend. I found him to be extremely intelligent, gentle, engaging, immensely curious and a person of deep humility who was intensely interested in education and international affairs. His goal was to ultimately become an American citizen and work towards reconciliation of the Israeli and Palestinian peoples. He is exactly the type of person the US should be proud to have as a citizen not a prisoner of our jails. My grandparents on my father's side were migrants from Eastern Europe in the early 1900's and my great grandparents from Ireland on my mother's side in the late 1800's. They came here for the freedom of a better life and relief from persecution. America should continue to that place.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely yours,

Robert E. Pitiger

EXHIBIT 1-AR

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Hello,

I am writing on behalf of Mohsen Mahdawi. I have known Mohsen for many years at this point, going back to when I cashiered at Dan and Whits (a local general store) during high school and college. Mohsen took the time to not only work with each employee and improve staff support, but also took the time to help modernize the store. Mohsen is compassionate, empathetic and non-violent. Mohsen traveled between the Upper Valley and Columbia University for many years as he pursues his degree (which is amazing and a testament to his determination and dedication). He continues to make significant contributions to the Columbia campus and academic life. Mohsen promotes intercultural and interfaith bridge-building as he strives to breakthrough divides between people with all backgrounds. I am confident he will do amazing things as he begins his Master's Program.

Mohsen is a key member rooted in our community.

I declare the above statements are all true and correct to the best of my knowledge and ability.

Sincerely,

Emma Woloshin

Upper Valley Nonprofit Program Director

EXHIBIT 1-AS

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This is my personal statement in support of Mohsen Mahdawi.

I am a resident of Norwich, VT.

I am a retired nurse practitioner.

I am Jewish, and member of the Upper Valley Jewish Community.

I have strong ties with Israel, having lived there for many years.

I met Mohsen when he worked at Dan & Whit's General Store in Norwich. He was a new face in that friendly environment, so I engaged him in conversation. When I learned he was from Israel-occupied Palestine, I made it a point to converse with him and discuss his circumstances, living in the Upper Valley, and his aspirations to continue his higher education and settle in Vermont. We discovered common ground in our hopes for a just peace in his native land

Sincerely,

Alice Werbel

EXHIBIT 1-AT

DECLARATION OF Elizabeth Gardner PURSUANT TO 28 U.S.C. § 1746

I, Elizabeth Gardner, declare as follows:

I write to support the immediate release of Mohsen Mahdawi from ICE detention.

I have known Mohsen for 9 years. During this time, I have watched Mohsen grow in his commitment to foster connections with Jews, Israelis, Muslims and Palestinians through personal conversations, intentional meetings at synagogues and through his participation at Lehigh and Columbia Universities. Mohsen is committed to peace in the Middle East and has worked tirelessly for this, even holding down his busy schedule as a student.

I have also watched Mohsen embrace the practice of Buddhism and non-violence over these past 10 years. He has been a law-abiding member of our community and is known and respected by the people of the Upper Valley as seen by the many, many letters you are receiving from all walks of life.

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

Executed on April 28, 2025.

/s/ *Elizabeth Gardner* Elizabeth Gardner

EXHIBIT 1-AU

April 17, 2025

To whom it may concern,

My name is and I am Mohsen Mahdawi's ex-wife. I first met Mohsen when I was a student in an Arabic Language program at Birzeit University, in the West Bank, Palestine, January 2013. We met my first week there; he was a representative of the University's Student Council, and he helped me sort out a billing issue I was having with my tuition. Our first interaction was marked by his kindness, interest in helping others, and charisma. I was also aware from the start that he had incredible people skills; he knew everyone, and he was liked by all.

Although it was not typically in my nature to date abroad, Mohsen and I became inseparable immediately. He didn't speak nearly any English, and I spoke even less Arabic. We used Facebook messenger to slowly type out and translate sentences to each other. He came from a conservative family – as was typical there – and he had almost no exposure to outside ideas. But his curiosity and open mindedness meant that we could understand each other and bridge great cultural divides very quickly. He had the singular and unique ability to hear a new idea, critically examine it, and release limited or previously unexamined ideas. We had much to learn from each other and we passed a year in this way, with his English rapidly improving and both of our minds expanding (his much faster than mine).

When Mohsen did arrive in the US, he faced challenges many immigrants face. We didn't have a lot of money, it was a small, rural town where we settled (Windsor, VT) and I was in school for long hours each day. He didn't have a driver's license and, in any case, we only had one car that I drove 20 miles to school each day. Despite these challenges, Mohsen thrived. He immediately built a community that continues to support him today. He took low paying jobs through which he rose quickly; typically taking on a high level of responsibility, in part because he was skilled, clever, and hardworking, but also because he earned people's trust and treated everyone like family. He brought joy, insight, introspection, and that same curiosity to every interaction.

We lived together in the Upper Valley for 2 years before parting ways. I continued to watch for his name when it would pop up in various little news stories in the Upper Valley or at universities he was attending. I saw that his mission to build bridges of peace and understanding to support an end to the conflict in Israel/Palestine was growing. He again,

built community, took on leadership roles, and engaged in open dialogue wherever he went.

Mohsen isn't just Palestinian anymore. In the last ten years he has changed; his mind has grown wide, and his heart has opened in ways I didn't imagine were possible. He is American; he is what American citizenship stands for – opportunity and hard work. He understands the balance that is freedom and responsibility. He has done the most with every opportunity American has granted him. With no special claims or entitlements, he has nearly completed his studies at one of the top universities in the Country. He has built a community of people who love him and are clearly willing to sacrifice for him. He has people here he calls father and brother. It is not just the place he has lived since he came from his Homeland. It is now his homeland; the place from which he tries to build bridges of peace and understanding between Jewish-Americans on one side, and his roots to Palestine. His efforts support peace in the Middle East; they do not undermine it. His effort support peace here in the United States.

I have known Mohsen longer than an any other US Citizen, although I don't doubt that you will receive character references from other US citizens who have known him almost as long. Everywhere he goes he inspires those around him to be more. He is everything that America stands for, opportunity, ingenuity, and hard work.

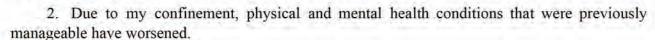
I declare that the above statements are all true and correct to the best of my ability. Sincerely,



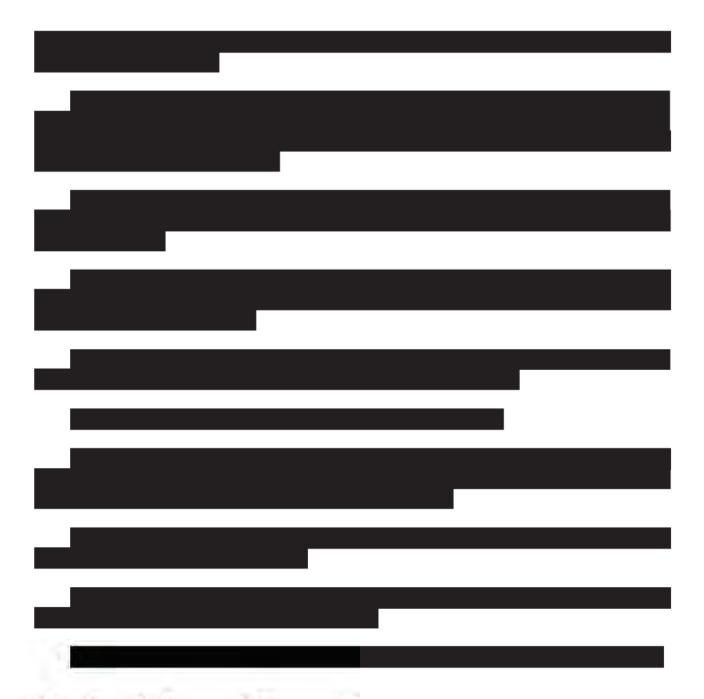
REPLY DECLARATION OF MOHSEN MAHDAWI

- I, Mohsen Mahdawi, declare under penalty of perjury as follows pursuant to 28 U.S.C. § 1746:
- 1. I am currently being detained in the Northwest State Correctional Center in Vermont.

Physical and Mental Pain Due to Pre-Existing Conditions Being Exacerbated by Confinement







Responding to the Government's Misrepresentations

- 20. It is my understanding that the government filed records of incident reports from the Windsor Police Department, including police descriptions of their conversations with two different people in August 2015 and with my ex-wife in November 2015. I also understand those people to have claimed I made certain statements. I never made those statements.
- 21. In the summer of 2015, I recall visiting a gun shop in Windsor, Vermont. I went to the gun shop with the goal of registering a shotgun that my ex-wife legally purchased me as a gift—the first firearm I ever owned. The sole purpose of this gift was to learn how to skeet shoot.

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- 22. The shop owner informed me that, because it was a gift from my wife, I did not need to register it in Vermont.
- 23. While there, I recall encountering the shop owner, who shared with me that he modified guns at his shop and offered to show me around.
- 24. I was previously an engineering student and have a great interest in machines and their mechanics, so I was interested in what he was showing me and telling me about.
- 25. I took some photographs of the shop and the machines used in the store, and asked questions about the mechanics of the machines.
- 26. I recall the owner asking me where I was from, and my answering that I was from Palestine and that I grew up in a refugee camp under the Israeli occupation.
 - 27. The conversation was not any more substantive than that.
- 28. I am certain that I did not communicate having ever made guns or "9mm submachine guns" for "Hizballah" or anyone else, as I have never done any such thing. I also did not ask for a job or volunteer to work for the shop owner for free.
- 29. The Precision Museum is located just a few blocks from the home my ex-wife and I shared, and is an institution in my neighborhood. I visited that museum on a few occasions, including with my ex-wife, but I do not recall all the specific visits.
- 30. On one visit, I recall having spoken with an employee of the museum. I shared my appreciation for ancient machinery, and he shared the mechanics of how the energy was being transferred from the water flow, into a water mill, in order to fuel the mechanic movement of the museum's machinery. This detail fascinated me, and left a lasting impression.
- 31. I am absolutely certain that I never expressed the words the report falsely attributes to me, in that exchange or ever. I am a peaceful person, and would never express wanting to harm or kill anyone. I am heartbroken to have such appalling words, which stand in complete contrast to my philosophy on life and spiritual beliefs, misattributed to me.
- 32. I can only speculate as to how or why an individual misattributed those alleged statements to me, but I believe it may be due to animus and/or stereotyping of me as a Palestinian or Middle Eastern man.
- 33. On November 18, 2015, I received contact from an agent from the Federal Bureau of Investigation (FBI) named Marc Emmons, who identified himself as assigned to the Burlington Resident Agency out of the Albany Field Office. He said that he wanted to meet with me and that

the meeting would be voluntary. I asked to meet at the Windsor Police Department, and I left work early to meet with him that same day. I requested a local police officer be present with us.

- 34. That day (November 18) was a difficult one for me, as I had ended my relationship with my ex-wife. Today I view her as one of the best partners I could have had. But on that day in November, we had gotten into a verbal fight when I got home from work to change clothing, on my way to meet the agent at the police department.
- 35. Once at the police department, Agent Emmons interviewed me in the presence of one officer of the Windsor Police Department, Sergeant Daniel Silver. Agent Emmons told me that they had received a report about me and wanted to follow up with me. I answered all of his questions.
- 36. A few months later, Agent Emmons told me they had "cleared" me in their investigation into the report they received, and agreed with me that the report might have been filed by someone fueled by animus towards me because of my ethnicity.
- 37. My dealings with the FBI agents were positive and we left things on good terms, exchanging holiday greetings here and there.
- 38. I also stayed on good terms with the Windsor Police Department sergeant, Daniel Silver, even having dinner with him and his wife on more than one occasion, and visiting their home.
- 39. I have worked several jobs since moving to Vermont, including renovating a house, managing a coffee shop, working in customer service at a bank, and working in a local business first as a tech manager and later as a business consultant. I was able to save money over the years. I spent some of what I was able to save on the occasional but rare vacation.
- 40. In 2019, I purchased a property for approximately \$51,000 in the Upper Valley. I had to borrow approximately \$30,000 from a close friend and have yet to pay back this person. I built a tiny cabin, 8' by 16', on this property, which cost me less than \$10,000.

41.

- 42. While I was returning from Canada to Vermont in January of 2019, I was pulled aside at the border for secondary screening. I was travelling with my prescribed travelled with vitamin supplements.
- 43. My medication and vitamins were seized outside of my view. It is my understanding that, after further testing, the pills all tested negative for methamphetamine.

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- 44. I was offered diversion. Although I know that I had done nothing wrong, I was told that if I accepted diversion, I could be done with the whole situation. Because I just wanted these false allegations to go away, I accepted diversion.
- 45. The matter was then expunged on March 25, 2022. (see Exhibit A to this Reply Declaration.) In the expungement letter, it clearly states I was "cited or arrested but a charge was never filed with the Court." *Id.* Based on the expungement, "[a]ll records related to the arrest" were "expunged or sealed." *Id.*

Release and Conditions

- 46. I hope to be released on bail pending adjudication of my habeas petition.
- 47. If I am released, I will comply with all the conditions of release imposed on me by the Court.
- 48. I have a home in Vermont, and I would be able to drive myself to and from court hearings.
- 49. I will comply with any such conditions, including staying in Vermont, New Hampshire, and travelling to and from New York City to attend Columbia University.
- 50. I would be happy to work with Burlington Community Justice Center to comply with whatever conditions the Court may set.

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

Executed on April 29, 2025, in Swanton, Vermont

Mohsen Mahdawi

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Vermont Superior Court

MAR 2 5 2022

STATE OF VERMONT

SUPERIOR COURT Orleans

CRIMINAL DIVISION CRIMINAL DIVISION Docket No. 132-3-19 Oscr

In RE: Moshen Mahdawi

	state Attorney herel	CRIMINAL HISTOR	e(s) meet the requirements
or expungement or sealing pursuant Expunge	to 13 V.S.A. §7602 and	that the Court may issu	ue an Order to:
☐ Seal ne criminal history record for the off	oncole) describedhelo	W	
Description of Offense	Date of Offense	Incident Number	Docket Number (if any)
Possession of a Controlled Drug	01/12/2019	_19A500154	n/a
(18 NZY 4934 (4)(1))			-
☑ I was cited or arrested by (nam	ne of arresting law enforcer	nent agency or department)	
VSP-Derby		but a charge was never	r filed with the Court.
		Signature of State's Actorn	ent &
	*		
	ORDER	Charles and the control of	- anve A Stent itie
ased upon the agreement of the De ereby ORDERED that criminal histo	efendant and the State ry record of the offens	's Attorney and pursuant e(s) described above be:	10 13 V.S.A. 97002, 10 13
☐ Sealed			
Il records related to the arrest, con	viction or sentencing f	or this/these offense(s)	shall be expunged or seale
Il records related to the arrest, con nd that the Defendant will hereafte	r be treated in all resp	ects as if he or she had	never been arrested,
onvicted of sentenced for the offen	se(s).		
ated of Signature		: D . O .	2-17
lectronically signed pursuant to V.R.E	E.F. 9(d)	Lisa a.	Nassen
4/04/2022 1:42:37 PM		Signature of Superior Co	
		Dilutoro et ault tras	
		-	
		Printed Name of Judge	

200-00132 - Stipulation to Expunge or Seal Criminal History Record + Order (09/2018)