

Exhibit B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-370-EAW

v.

JEFFREY SEARLS, in his official capacity
as Acting Assistant Field Office Director and
Administrator, Buffalo Federal Detention
Center,

Respondent.

DECLARATION OF MICHAEL W. MEADE

I, Michael W. Meade, declare as follows:

1. I am employed by the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Office of Enforcement and Removal Operations (ERO), as the Field Office Director (FOD) for ICE ERO Miami Field Office (MIA), which includes the Krome Service Processing Center, Broward Transitional facility and Glades Detention Center as well as additional offices throughout Florida, Puerto Rico, and the U.S. Virgin Islands.

2. Prior to this assignment, I served as the Deputy Field Office Director for MIA coordinating Enforcement and Removal functions, operations and detainees within 67 counties in Florida, Puerto Rico and the U.S. Virgin Islands.

3. I began my career with the United States Government on June 30, 1991 with the former U.S. Immigration and Naturalization Service (INS) as an Immigration Inspector at Miami International Airport.

4. From 1996 to 1998, I served in the position of a Deportation Officer at the Miami District Office of INS. In 1998, I became the Field Training Officer for Miami Deportation and was responsible for the training of all new officers, as well as ongoing training for the entire District Office staff.

5. In November of 2001, I was selected as a Supervisory Deportation Officer (SDO) and served in the position of the Special Assistant to the Officer-in-Charge for Krome SPC. In April of 2004, I was selected to be the Deputy Officer-in-Charge for Removal Operations at Krome SPC.

6. In November 2008, I was selected to be a Deputy Field Office Director in the Miami Field Office.

7. ICE is charged with enforcement of more than 400 federal statutes, and its mission is to protect the United States from the cross-border crime and illegal immigration that threaten national security and public safety through enforcement of the federal laws governing border control, customs, trade, and immigration. To carry out this mission, ICE focuses on enforcing federal immigration laws, preventing terrorism, and combating transnational criminal threats.

8. As an operational program of ICE, ERO is responsible for the planning, management, and direction of broad programs relating to the supervision, detention, and removal of aliens who are removable from the United States under the U.S. immigration laws.

9. I am aware of the Joint Report Regarding Conditions of Release filed by the parties on June 23, 2020.

10. I make this declaration to inform the Court as to what efforts would be necessary

on behalf of ICE, pursuant to its Title 8 authorities, to monitor a convicted terrorist if the Court orders Petitioner's release from the Buffalo Federal Detention Facility (BFDF) in Batavia, New York to reside in Miami, Florida area.

11. Upon Petitioner's release from the BFDF in Batavia, New York, he will have to arrange his own transportation to the Miami, Florida area where he has indicated he intends to reside with his sister. ICE ERO will require that Petitioner report to ICE ERO Miami office within five (5) days of his release. Monitoring Petitioner's travel from New York to Florida is burdensome operationally and will require close cooperation with ICE's federal partners and a significant expenditure of personnel and financial resources.

12. ICE ERO uses Alternatives to Detention (ATD) program as a flight-mitigation tool that uses technology and case management to ensure compliance with release conditions and facilitate alien compliance with court hearings and final orders of removal, while allowing aliens to remain in their community – contributing to their families and community organizations and, if necessary, wrapping-up their affairs in the United States – as they move through immigration proceedings.

13. While ATD is an effective tool for ICE ERO, it requires significant resources, personnel, and logistical support to perform enforcement actions and ensure compliance. For instance, numerous requests from Petitioner for permission to leave the confines of his sister's residence will place a significant strain on ICE ERO resources as they will require additional personnel to adjudicate them.

14. Due to the national security concerns related to Petitioner, ICE ERO plans to place him on an Order of Supervision (OSUP) and fit him with a GPS ankle monitor as part of its ATD program. ICE ERO will require that he meet the specific conditions set forth via the

OSUP, including limitations on his movement outside of home confinement and the requirement that he notify ICE in advance if he wants to travel outside of the designated boundaries, provide the dates and times of visits to pre-approved places of worship, and report within seven days of any emergency or medical visits where it was not possible to obtain prior authorization due to a medically-verified emergency.

15. While ICE ERO has the capability to set reporting conditions for Petitioner and to track his physical movement via a GPS ankle monitor, ICE will need to rely on cooperation from its government partners to attempt to mitigate the threat posed by Petitioner.

16. Furthermore, ICE will be heavily relying on joint efforts of its federal partners and intergovernmental cooperation to ensure Petitioner's compliance with the vast majority of the release conditions imposed by the court, which will also place a significant strain on these government agencies' resources.

Signed on this 24th day of June 2020.

A handwritten signature in blue ink, appearing to read "Michael W. Meade", is written over a horizontal line.

Michael W. Meade
Field Office Director
ICE Enforcement and Removal Operations