

# **Exhibit A**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-00370-EAW

v.

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

Respondent.

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**DECLARATION OF MARLEN PIÑEIRO**


I, Marlen Piñeiro, in accordance with 28 U.S.C. § 1746, declare as follows:

1. I am employed by the U.S. Department of Homeland Security (DHS), U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), as the Assistant Director for Removal. ERO's Removal Division, located at ICE Headquarters in Washington, D.C., is responsible for assisting ERO's field offices in obtaining travel documents necessary to execute administratively final orders of removal, as well as coordinating, managing, and facilitating the return/removal of aliens from the United States. I have been permanently employed with ICE and the former Immigration and Naturalization Service since 1987, and I have been serving in my current position since December 2013.
2. My present duties include complete oversight of removal operations to include travel document procurement and ICE Air Operations.

3. This declaration is based upon my personal knowledge, information provided to me in my official capacity, and information obtained from records maintained by DHS. This declaration is an update to information provided in ICE's July 16, 2020 declaration.
4. I am familiar with the removal case of Adham Hassoun, Alien Number: A074-079-095. While in ICE custody, he was detained at the Buffalo Federal Detention Facility (BFDF) in Batavia, New York.
5. On July 21, 2020, ICE successfully removed Hassoun pursuant to his final order of removal from the United States to a third country via ICE Air charter flight.
6. At this time, Hassoun is no longer in ICE custody or within the United States.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief, and based upon records maintained in the ordinary course of business.

Executed on this 22nd day of July 2020 in Washington, D.C.

  
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Marlen Piñeiro  
Assistant Director for Removal  
ICE Enforcement and Removal Operations