

Exhibit 1

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

ADHAM AMIN HASSOUN,

Petitioner,

v.

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

Respondent.

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

PETITIONER'S FIRST SET OF INTERROGATORIES

PLEASE TAKE NOTICE that pursuant to Rule 33 of the Federal Rules of Civil Procedure, 28 U.S.C. § 2241, and the Court's order dated December 20, 2019, ECF No. 58, Petitioner Adham Amin Hassoun, by and through his attorneys, hereby demands that Respondent serve upon the undersigned attorneys responses in writing under oath to each of the following interrogatories by January 6, 2020 in accordance with the definitions and instructions below.

DEFINITIONS

The following definitions shall apply to these Requests:

1. "This Matter" or "the matter" means the Petition in the above-captioned action filed in the Western District of New York on March 15, 2019.
2. "Respondent" means JEFFREY SEARLS, any U.S. government official, and any other person acting under color of law, including private contractors and employees/agents of the U.S. government.
3. "Petitioner" means ADHAM AMIN HASSOUN.
4. "Person" means any natural person or any legal entity, including, without limitation, any business or governmental entity, organization or association.
5. "Witness" or "informant" means any person that the government intends to call at the evidentiary hearing to be set by the Court in this matter, or any person upon which the government relied on to determine that Petitioner should be certified under 8 C.F.R. § 241.14(d) or 8 U.S.C. § 1226a.

6. "Relate," "related," or "relating" mean, in addition to their usual and customary meanings, concerning, referring to, reflecting, regarding, pertaining to, addressing, discussing, alluding to, describing, evidencing, constituting or otherwise having any logical or factual connection with the subject matter addressed.
7. The word "any" shall be construed to include "all," and vice versa.
8. The word "each" shall be construed to include "every," and vice versa.
9. Any word in the singular form shall also be construed as plural, and vice versa.
10. The masculine form shall also be construed to include the feminine, and vice versa.
11. The interrogatories have no time limitation unless otherwise specified below.

INSTRUCTIONS

1. Each interrogatory is to be answered fully based on information in Respondent's possession, custody or control, or in the possession, custody or control of Respondent's representatives, agents or attorneys.
2. If you object to any interrogatory or any portion of an interrogatory on the ground that the answer reflects or would reveal the substance of a privileged communication, identify:
 - (a) the nature of the privilege claimed;
 - (b) the person who made the communication, whether oral or in writing;
 - (c) if the communication was oral, all persons present while the communication was made;
 - (d) if the communication was written, the author, addressees and any other recipients;
 - (e) the relationship of the author of the communication to each recipient;
 - (f) the relationship of the persons present to the person who made the communication;
 - (g) the date and place of the communication; and
 - (h) the general subject matter of the communication.
3. These interrogatories are continuing in nature. If you receive or otherwise become aware of information responsive to any interrogatory after you have served your answers to these interrogatories, you must promptly supplement or amend your answers to these interrogatories to provide such information.
4. Answers to these interrogatories shall be served upon the undersigned attorneys by January 6, 2020, pursuant to the Court's order on December 20, 2019. ECF No. 58.

INTERROGATORIES

1. Identify all informants (including their past and present histories and locations of incarceration and/or detention) relied upon in preparing the Federal Bureau of Investigation's (FBI) letter dated February 21, 2019, and provided as part of the administrative record in this matter.
2. Identify all persons interviewed or contacted by the government from October 2017 to present regarding Petitioner but on whom the FBI did not rely in its letter dated February 21, 2019, and provided as part of the administrative record in this matter.
3. Identify all government officials (including their agency affiliations and job titles) who took witness statements, conducted interviews, and/or gathered evidence in connection with Department of Homeland Security's determination to certify Petitioner under 8 C.F.R. § 241.14(d) or 8 U.S.C. § 1226a, or the development of the FBI's recommendation to certify Petitioner under these provisions.
4. Identify all witnesses Respondent intends to call at the evidentiary hearing to be set by the Court in this Matter.

Dated: December 23, 2019
Buffalo, New York,

Jonathan Hafetz
Brett Max Kaufman
Charlie Hogle*
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004
212-549-2500
jhafetz@aclu.org
*New York bar admission pending

Judy Rabinovitz
Celso Perez
American Civil Liberties Union Foundation
Immigrants' Rights Project
125 Broad Street, 18th Floor
New York, NY 10004
212-549-2616
jrabinovitz@aclu.org

Victoria Roeck
Christopher Dunn

Respectfully submitted,

/s/ A. Nicole Hallett

A. Nicole Hallett
Jonathan Manes
Supervising Attorneys

Richard Barney III
Erin Barry
Colton Kells
Andrew Kij
Marline Paul
Jesselyn Zailac

Student Attorneys
507 O'Brian Hall, North Campus
University at Buffalo School of Law
Buffalo, NY 14260
716-645-2167
jmmanes@buffalo.edu
nicole@buffalo.edu

New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
212-607-3300
cdunn@nyclu.org

Counsel for Petitioner