



**U.S. Department of Justice**  
Civil Division  
Office of Immigration Litigation  
District Court Section

---

*P.O. Box 868, Ben Franklin Station  
Washington, DC 20044  
Tel: (202) 532-4074  
Email: steven.a.platt@usdoj.gov*

July 20, 2020

**VIA ELECTRONIC FILING**

Honorable Catherine O'Hagan Wolfe  
Clerk of Court  
United States Court of Appeals for the Second Circuit  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Hassoun v. Searls*, Case No. 20-2056  
Appellant's Notice of Intent to Remove

Dear Ms. Wolfe,

The Government notifies the Court that U.S. Immigration and Customs Enforcement (ICE) intends to remove Petitioner Adham Amin Hassoun from the United States to a third country during the week of July 20, 2020. *See* Marlen Piñeiro Decl. ¶ 6 (attached). The U.S. government has reached an agreement with a third country to accept Petitioner upon his removal from the United States. Piñeiro Decl. ¶ 5. ICE is unaware of any obstacles that would prevent Petitioner's removal as scheduled. Piñeiro Decl. ¶ 6.

Undersigned counsel has informed Hassoun's counsel of this information and provided counsel the name of the third country.

Sincerely,

*/s/ Anthony D. Bianco*

Anthony D. Bianco  
Senior Counsel for National Security  
United States Department of Justice  
Office of Immigration Litigation

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 MARLEN PIÑEIRO**

I, Marlen Piñeiro, 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.

4. I am familiar with the removal case of Adham Hassoun, Alien Number: A074-079-095. Mr. Hassoun is the subject of an administratively final order of removal as of June 27, 2003. On October 14, 2017, Mr. Hassoun was taken into ICE custody after completing his criminal sentence for conspiracy to murder, kidnap and maim persons in a foreign country; conspiracy to provide material support to terrorism; and providing material support to terrorists. He remains detained in ICE custody at the Buffalo Federal Detention Facility (BFDF) in Batavia, New York.
5. Coordinated efforts by ICE, the U.S. Department of Justice, and the U.S. Department of State (DOS) have successfully resulted in an agreed-upon plan to remove Mr. Hassoun to a third country, including affirmative agreement by the Government of that third country to accept Mr. Hassoun's resettlement.
6. ICE is now in the process of finalizing the logistical arrangements required to effectuate such removal, which is scheduled to occur during the week of July 20, 2020. At this time, there are no known obstacles that would prevent Mr. Hassoun's removal as scheduled.

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.

Signed on this 15th day of July 2020.



Marlen Piñeiro  
Assistant Director for Removal  
ICE Enforcement and Removal Operations