

# **EXHIBIT 1**

Alice Miller  
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U.S. Department of Homeland Security  
U.S. Immigration and Customs Enforcement  
830 Pinehill Road  
Jena, Louisiana 71342  
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☒ DETAINED

UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
IMMIGRATION COURT  
JENA, LOUISIANA

IN THE MATTER OF:	)	
	)	In Removal Proceedings
MAHMOUD KHALIL	)	
	)	A [REDACTED]
	)	
Respondent	)	

Immigration Judge: Comans

Next Hearing 4/11/2025

The U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement (“Department”) submits the following documents in the above referenced case in support of allegation five and the charge under INA section 237(a)(4)(C)(i).

Tabs	Documents
A	<p data-bbox="302 348 375 380">Letter</p> <p data-bbox="302 422 578 495">The Secretary of State Washington</p> <p data-bbox="302 527 548 558">From: Marco Rubio</p> <p data-bbox="302 600 1300 674">Subject: Notification of Removability Determinations under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)</p>

Respectfully submitted on April 9, 2025,

NUMA V

METOYER III

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Numa Metoyer  
Deputy Chief Counsel  
Department of Homeland Security  
U.S. Immigration and Customs  
Enforcement 830 Pinehill Road  
Jena, Louisiana 71342

**CERTIFICATE OF SERVICE**

On the date below, I have provided a copy of the Department of Homeland Security Document Submission to the respondent and/or the respondent's counsel via:

- ☐ Central Louisiana ICE Processing Center  
830 Pinehill Rd,  
Jena, Louisiana 71342
- ☒ the Executive Office for Immigration Review (EOIR) Court & Appeals System (ECAS), in accordance with 8 C.F.R. 1003.31. The electronic case record in ECAS includes a Form EOIR-28 Notice of Entry of Appearance, which indicates the respondent is represented by counsel for this proceeding. Pursuant to 8 C.F.R. 1003.32, filing the foregoing via ECAS will effectuate service of the motion upon the respondent.
- ☐ River Correctional Center  
26362 Highway 15  
Ferriday, LA 71334
- ☐ OTHER:

NUMA V  
METOYER III

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V METOYER III  
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Numa Metoyer  
Deputy Chief Counsel Department  
of Homeland Security Immigration  
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Pinehill Road Jena, Louisiana  
71342

4/9/25

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Date

TAB A





THE SECRETARY OF STATE  
WASHINGTON

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio

SUBJECT: (SBU) Notification of Removability Determinations under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 7, 2025, I have determined that [REDACTED] and Mahmoud Khalil (DOB: [REDACTED]; POB: Algeria), both U.S. Lawful Permanent Residents (LPRs), are deportable aliens under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against them, based on assurances from DHS/ICE/HSI.

(SBU) Under INA section 237(a)(4)(C)(i), an alien is deportable from the United States if the Secretary of State has reasonable ground to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States. Under INA section 237(a)(4)(C)(ii), for cases in which the basis for this determination is the alien's past, current, or expected beliefs, statements, or associations that are otherwise lawful, the Secretary of State must personally determine that the alien's presence or activities would compromise a compelling U.S. foreign policy interest.

(SBU) Pursuant to these authorities, I have determined that the activities and presence of these aliens in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest. These determinations are based on

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Classified by: Secretary of State Marco Rubio  
E.O. 13526, Reason(s): 1.4 (justification sections)  
Declassify on: Month DD, YYYY



SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

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information provided by the DHS/ICE/HSI regarding the participation and roles of [REDACTED] and Khalil in antisemitic protests and disruptive activities, which fosters a hostile environment for Jewish students in the United States. My determination for [REDACTED] is also based on [REDACTED] citations for unlawful activity during these protests. The public actions and continued presence of [REDACTED] and Khalil in the United States undermine U.S. policy to combat anti-Semitism around the world and in the United States, in addition to efforts to protect Jewish students from harassment and violence in the United States. Consistent with E.O. 14150, America First Policy Directive to the Secretary of State, the foreign policy of the United States champions core American interests and American citizens and condoning anti-Semitic conduct and disruptive protests in the United States would severely undermine that significant foreign policy objective.

#### **Attachments**

- Tab 1 – DHS Letter on [REDACTED]
- Tab 2 – HSI Subject Profile of [REDACTED]
- Tab 3 – DHS Letter on Mahmoud Khalil
- Tab 5 – HSI Subject Profile of Mahmoud Khalil
- Tab 5 – 8 USC 1227(a)(4)(C)

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