

Marc Van Der Hout
Johnny Sinodis
Oona Cahill
Van Der Hout LLP
360 Post Street, Suite 800
San Francisco, California 94108
Telephone: (415) 981-3000
Facsimile: (415) 981-3003

DETAINED

Attorneys for Respondent
Mahmoud KHALIL

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

In the Matter of:

Mahmoud KHALIL,

Respondent,

In Removal Proceedings.

[REDACTED]
Hearing Date: N/A
Hearing Time: N/A
Before: Hon. Judge Jamee E. Comans

**ADDITIONAL EVIDENCE AND DOCUMENT LIST FOR MR. KHALIL REFUTING
THE CHARGES AGAINST HIM IN THE NOTICE TO APPEAR AND FORM I-261**

On April 23, 2025, I, Johnny Sinodis, caused the enclosed document to be served on the U.S. Department of Homeland Security via the EOIR Courts and Appeals System (ECAS). This document was electronically filed through ECAS and both parties are participating in ECAS. Therefore, there is no separate service completed.

Executed this 23rd day of April 2025.

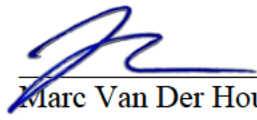


We include a separate certificate of service on the final page, as requirements vary by Immigration Courts

Respondent, Mr. Mahmoud KHALIL, [REDACTED], through counsel, hereby submits attached Exhibits A through F in further rebuttal to the charges in the Notice to Appear and the Form I-261, Additional Charge of Inadmissibility/Deportability.

Dated: April 23, 2025

Respectfully submitted:



Marc Van Der Hout
Johnny Sinodis
Oona Cahill
Van Der Hout, LLP

Attorneys for Mr. Khalil

ADDITIONAL EVIDENCE REFUTING ALLEGATIONS OF ANTISEMITISM IN THE RUBIO MEMORANDUM AND CLARIFYING MR. KHALIL’S ROLE AS A NEGOTIATOR ON BEHALF OF ALL STUDENTS

A. Letter from [REDACTED], dated March 19, 20251

I am writing this letter to you in support of Mahmoud Khalil. My name is [REDACTED] and I am a U.S. citizen and identify as Jewish. I graduated from Columbia University’s School of International and Public Affairs (SIPA) in May 2024 and have known Mahmoud Khalil for about two years since he started his studies at SIPA in January 2023.

I consider Mahmoud a colleague, fellow advocate and profound human being. I regard Mahmoud as a thoughtful, committed, highly intelligent, curious and pacifistic person. I developed this understanding of his character through my many interactions with him at Columbia in classrooms, social outings, and advocacy circles. I have had countless discussions with him about international affairs, politics and the Israeli-Palestinian conflict. I can point to several specific examples that highlight Mahmoud commitment to non-violent, respectful language and building an inclusive pro-Palestinian movement on campus.

My first interaction with Mahmoud was in March 2023. Over the prior winter break, I participated in a trip to the Occupied Palestinian Territories organized by PalTrek National. As a follow-up to the trip, a discussion was convened with participants of the trip to highlight our experience. I offered to speak about my experience as a Jewish person who has traveled to Israel on multiple occasions before this trip. I was honest about my participation in Birthright International, a fully-funded trip for American Jewish youth to experience Israel. Birthright has received criticism from anti-Israel groups for its support of resettling American Jews to Israel, often at the expense of Palestinian families. While some students at SIPA expressed valid concerns about including my experience over others from the trip, Mahmoud personally welcomed my inclusion in the panel. Mahmoud saw the importance of including my voice in this discussion and highlighting the complicated pressures on American Jews. Mahmoud, starting at SIPA in January, did not participate in the trip and did not know me beyond my identity as Jewish and previous participant in Birthright. Instead of leaning into stereotypes or succumbing to the pressures of others, Mahmoud saw me as a human being with a long and complicated relationship to my religious identity and its connection to the state of Israel.

The next incident I’d like to highlight occurred in October 2023. Following the Hamas-led terrorist attacks on October 7th and subsequent military response by Israel, the Dean of SIPA, Keren Yarhi-Milo, asked to meet with some SIPA students to understand the impact of the war on Palestinian students. Mahmoud was in attendance. Mahmoud began the meeting by asking Dean Yarhi-Milo, an Israeli citizen, how she, her family and community were doing in light of the terrorist attack. In asking the question, Mahmoud condemned the violent, hateful act by Hamas terrorists and expressed grief for the immediate loss of life and continued impact on the communities. Even Dean Yarhi-Milo appeared touched by the question and expressed

gratitude for his consideration of her experience of this violence as an Israeli woman.

From October 2023, tensions on campus elevated. I've watched Mahmoud on several occasions de-escalate tense situations on campus, leading with peace to usher a constructive dialogue rather than inciting aggression that leads to hate speech. I saw Mahmoud, as well as other Arab classmates, confronted and, at times, harassed by other students, asking him if he supported Hamas. Mahmoud would not raise his voice or respond with aggression, but instead simply answer the question by condemning Hamas and all forms of violent extremism. Mahmoud recognized this was a tactic to coerce him to promote hateful or extremist language, but he never wavered in his denouncement of all forms of violent extremism, including the actions of Hamas on October 7th.

On October 25th 2023, over 20 students, including myself, were targeted in a doxing campaign by the right-wing media organization, Accuracy in Media. The organization launched an online petition, personal website for each student, and paraded a billboard truck around campus displaying my name and photo under the banner, "Columbia's Leading Antisemite." The false statement was attributed to my position as the President of SIPA's Human Rights Working Group. Mahmoud, not targeted at that time by this doxing campaign, reached out to me personally to check in on my well-being. He recognized that my identity and work experience with Jewish organizations contradicted the claim of antisemitism, and offered his support. He expressed his support not in justification of antisemitism, but as defamatory action to distract from legitimate antisemitism happening on campus, saying to me, "by targeting the Jewish student and ignoring the very real antisemitism happening on campus, [Accuracy in Media] has made it clear their motives are not to protect Jewish people."

I can point to additional incidents that occurred in April 2024 during the Solidarity Encampment at Columbia University. During the Encampment, Mahmoud led community-wide discussions on how to ensure the space was free from hate and discrimination. Through this, he helped develop community guidelines for the encampment that indicated any expression of hate speech will not be tolerated. On one occasion, some individuals made remarks that I personally found offensive as a Jewish person. I saw Mahmoud visibly uncomfortable, and instead of berating or verbally attacking the individuals, he approached them calmly to deescalate the situation by saying, "that's not a productive approach. We need to focus on law, not emotion." His priority has always been advocacy through nonviolent means, centering facts, legal arguments, and mutual respect.

ICE may attempt to use his participation in the Encampment protest against him, but that would be a complete distortion of reality. Mahmoud has actively included Jewish voices in conversations about Israel-Palestine. In fact, during the first day of Jewish Holy Days of Passover, I asked Mahmoud for his help in hosting a Passover Seder at the Encampment specifically for a non-Jewish audience. Mahmoud was very helpful in connecting me with the leadership of the Encampment and ensuring I had a large, safe space to host the Seder. Not only did he attend the Seder, Mahmoud invited his non-Jewish friends, understanding the importance of including non-Jews in the celebration of this Holy Day. Following the Seder, he commented to me directly, "thank you for hosting and inviting me to this Seder. It was my

first time being invited to a Passover Seder and I am very thankful to have learned more about Judaism.” His gratitude and support of this initiative further highlights his understanding of the value of including Jewish voices in typically non-Jewish spaces. In that moment, Mahmoud saw me, not just as a Jew but as a fellow human being equally committed to his message of nonviolence and peace.

Additionally, ICE and Federal officials may penalize Mahmoud for his visibility during Columbia’s protests because he was selected as a press representative from the student negotiating team. Only specific students were selected for these roles to ensure the peaceful purpose of the protests were expressed calmly and without hatred. I watched him on several occasions be tested by the press with leading questions that sought to charge the conversation with antisemitic or extremist messaging, and Mahmoud maintained his calmness, commitment to promoting peace on campus and sensitivity to hateful or extremist rhetoric. His role as a student negotiator underscores his commitment to finding a peaceful end to the Encampment through dialogue with Columbia’s administration.

I trust these examples provide insight into Mahmoud’s character and context to his participation in nonviolent protests that may be weaponized against him. His commitment to peaceful dialogue, particularly the creation of interfaith spaces, exemplifies what I have personally witnessed: Mahmoud has never engaged in or expressed support for antisemitic nor extremist ideology. He is an incredible advocate, good-faith member of the Columbia Alumni community, and a kind human being.

B. Letter from [REDACTED], dated March 14, 20255

I am writing in support of Mahmoud Khalil. My name is [REDACTED] and I am an American Jewish woman who believes in the importance of Israel as a Jewish homeland. I have known Mahmoud Khalil for over two years, since January 2023 as his professor, colleague, and friend. I have always known Mahmoud as someone working to be part of the solution towards a peaceful resolution to the conflict in Palestine and Israel. He is committed to peaceful development which is also what our graduate program – the Master of Public Administration in Development Practice (MPA-DP)– trains students on.

I have known Mahmoud in my capacity as his Professor at Columbia University for two semesters (Spring 2023 DP-Lab I and Fall 2023 DP-Lab II courses), and then as his supervisor in his role as a Teaching Assistant for the course DP-Lab II: Organizational Management (Fall 2024). In between semesters I also interacted with Mahmoud, due to his role as a Program Assistant for the MPA-DP program which I am affiliated with as a Professor and alumna.

I have worked with Mahmoud and directly seen and graded his work. This work has demonstrated a deep and persistent commitment to humanitarian principals and doing work that contributes to peace and stability. Both semesters when he was my student, he focused his semester long project assignments on a non-profit organization (Jusoor, where he also previously worked) providing education services to refugees. I had many conversations with him about how to deepen educational impact and ensure that refugees would have real

economic opportunities to escape cycles of violence and poverty.

When it came time to choose a Teaching Assistant for the Fall 2024 iteration of the course, I sought out Mahmoud to apply to the position. His deep expertise with organizational management with international development organizations, his high standards for quality work, as well as his integrity were all reasons I thought he would make a great TA. He effectively served the class and students throughout the semester even as he navigated both global and campus events that were directly impacting him and his family.

I can state with full confidence that Mahmoud has never expressed support for Hamas, nor has he ever endorsed any form of extremism. Over the course of our extensive interactions, I have had numerous conversations with him about human rights, justice, and the student protests and I can personally attest to his commitment to nonviolence.

In terms of the campus protests, Mahmoud was my student as these events unfolded and was in the process of being hired as our Teaching Assistant as the encampment was being established. I directly spoke to him about the encampment and Mahmoud emphasised the protesters commitment to peace and non-violence. Mahmoud explained how the student movement was ensuring that Jewish voices were part of conversations and space. He was committed to dialogue and partnership with Jewish voices throughout his time on campus, one example of this was sharing a Jewish Sukkot event with me that he was attending put on by Jewish and Palestinian students on October 16th, 2024.

As our TA in Fall 2024 for a course for which Leadership was a key theme, he clearly spoke about the challenges of being seen as a leader of leaderless student movement. Many things have been incorrectly attributed to him in the media.

Mahmoud has always worked to be part of the solution towards a peaceful resolution to the conflict in Palestine and Israel. He is committed to peaceful development which is also what our graduate program – the Master of Public Administration in Development Practice – trains students on. Choosing to do this program, which trains students for public sector and public interest work also demonstrates his commitment to these issues. Everything he has ever worked on professionally and academically demonstrates his commitment to humanitarian principals including justice, peace, and development.

C. Letter from [REDACTED]s, dated March 14, 20257

My name is [REDACTED] and I am writing this letter in support of Mahmoud Khalil. I am currently a junior at Columbia University. I grew up in Forest Hills, Queens, raised by my Jewish mother and my American father. From a young age, I was taught the importance of higher education in shaping a well-rounded individual. My father, Brian Jones, exemplified this belief—he graduated from Harvard in 1993, becoming the first in our family to attend an Ivy League institution.

Judaism has always been central to my identity. I attended Jewish preschool, went to Hebrew school multiple times a week until my Bar Mitzvah in 2017, celebrated Shabbat every Friday,

and was raised with strong Jewish values. I emphasize this not to exaggerate or embellish, but to paint a clear picture of who I am. My Jewish identity is deeply meaningful to me, and in these past 16 months—an incredibly difficult time for the Jewish people—having a strong support system of kind, understanding, and respectful individuals has been more important than ever. Mahmoud is exactly that.

From the moment I met Mahmoud 16 months ago, he has been nothing short of a selfless friend and an inspiring mentor. I clearly remember one of our first encounters at a peaceful rally on October 12, 2023. Despite how such events are often misrepresented in the media, this rally was a calm and peaceful demonstration in support of Palestinian rights. Mahmoud took on a protective security role that day, ensuring students were safe from any physical or verbal threats. When people hurled insults and profanities at me and my classmates, Mahmoud was the first to step in and de-escalate the situation. He never raised his voice, never used harsh language, never resorted to aggression—he spoke calmly and respectfully, shielding students, including me, a Jewish student, from harm. He put himself between me and an aggressor, prioritizing my safety over his own. That is not the behavior of an antisemite—that is the behavior of an ally and a friend.

In the weeks that followed, I spent many late nights with Mahmoud at friends' apartments, getting to know him and hearing his incredible story—one that led him to work at the U.N. During this time, he also began attending Shabbat dinners I hosted with my friends. He would often bring a dish or a bottle of kosher wine to contribute, embracing the tradition with genuine curiosity and respect. He actively listened to the prayers, enthusiastically engaged with Jewish culture, and always approached our traditions with kindness.

At a later protest in November, I witnessed firsthand Mahmoud's unwavering commitment to protecting Jewish students. When an unaffiliated individual began shouting antisemitic slogans, Mahmoud was the first to intervene, immediately de-escalating the situation and ensuring the safety of those present. This came as no surprise—I already knew that Mahmoud was someone I could trust to stand up for me and my community.

Over the months, our friendship deepened. We shared meals, laughs, and countless memories. Mahmoud was not just a source of strength and support in my life but in the lives of so many others. He was always there—a shoulder to cry on, a friend to lean on, and a wise and compassionate presence in our community.

D. Letter from [REDACTED] dated March 14, 20259

My name is [REDACTED] I am a Jewish student at Columbia University writing in support of my friend, Mahmoud Khalil. I am writing this letter because I know that if I ever needed him to do it for me, he would, and so much more, because that's the kind of person Mahmoud is. We know each other through sharing space more times than I can count, at protests and at community events and at concerts and Shabbats. He is someone who I trust implicitly. He is someone who always puts himself between those around him and danger, and he does it without thinking and without flinching. He does it even with people who he doesn't know well. We're not best friends but I know that if I was in danger, Mahmoud would do

everything in his power to protect and help me—as lead negotiator during the encampment this is exactly what he did, protecting me and so many other student protestors who were being punished for speaking up against genocide. This letter is the least I can do for someone who has always selflessly and courageously put others before himself. I can’t believe that it’s precisely because of these incredible qualities he is being punished in this way. Mahmoud has protected Jewish students at Columbia like myself more than the university ever has. He has even protected us from the university itself. To punish him under the pretence that this kind, brave, gentle person somehow endangered us is the most egregious lie I’ve ever heard. His strength is only matched by his calmness even in the most stressful circumstances. I’ve never heard him raise his voice except at protests. I can’t describe the sense of immediate comfort that one felt in his presence, and every minute I think of him detained, it hurts.

ADDITIONAL EVIDENCE DEMONSTRATING THE SOCIETY FOR INTERNATIONAL DEVELOPMENT WEBSITE SUBMITTED BY DHS IS OUTDATED, ERRONEOUS, AND DOES NOT ESTABLISH THAT MR. KHALIL WORKED FOR THE UK’S SYRIA OFFICE IN BEIRUT BEYOND 2022

- E.** Letter from Katherine Raphaelson, President, Society for International Development, dated April 20, 2025, confirming that Mr. Khalil was a speaker at the Society’s conference in 2020 and is not a speaker for the 2025 conference10

The Society for International Development, United States Chapter (SID-US) is a nonpartisan, non-lobbying, nonprofit corporation incorporated in the District of Columbia dedicated to the advancement of sustainable, effective development worldwide since 1957. SID-US serves as a global town square to convene practitioners, thought leaders, and public and private institutions.

In response to your request for information regarding Mr. Mahmoud Khalil’s participation in SID-US events, I write to advise you that Mr. Khalil spoke at our 2020 Annual Conference in his capacity of Program Manager at the Syria Office in the British Embassy in Beirut, where, according to the bio we were provided, he lead the Syria Chevening Program. Mr. Khalil has not been invited by SID-US to speak or participate at any SID-US event in any capacity before or since our 2020 Annual Conference.

ADDITIONAL EVIDENCE DEMONSTRATING MR. KHALIL’S PUBLICLY DISCLOSED POSITION AT UNRWA WAS AN INTERNSHIP FOR COURSE CREDIT THROUGH HIS COLUMBIA MASTER’S PROGRAM

- F.** Letter from Greta Gunnarsdottir, Director, UNRWA Representative Office, dated April 22, 202511

Mr. Mahmoud Khalil served as an intern at the UNRWA Representative Office in New York, on a full-time basis from 7 June to 31 August 2023 and on a part-time basis from 1 September to 30 November 2023 to allow for the continuation of his studies at Columbia University.

The internship was an unpaid voluntary position in accordance with the practice of the Agency.

March 19, 2025
[REDACTED]

Honorable Michael E. Farbiarz
United States District Judge
District of New Jersey
Martin Luther King Courthouse
50 Walnut Street
Newark, NJ 07101

PURSUANT TO 28 USC 1746, I HEREBY DECLARE THE FOLLOWING:

Dear Judge Farbiarz,

I am writing this letter to you in support of Mahmoud Khalil. My name is [REDACTED] and I am a U.S. citizen and identify as Jewish. I graduated from Columbia University's School of International and Public Affairs (SIPA) in May 2024 and have known Mahmoud Khalil for about two years since he started his studies at SIPA in January 2023.

I consider Mahmoud a colleague, fellow advocate and profound human being. I regard Mahmoud as a thoughtful, committed, highly intelligent, curious and pacifistic person. I developed this understanding of his character through my many interactions with him at Columbia in classrooms, social outings, and advocacy circles. I have had countless discussions with him about international affairs, politics and the Israeli-Palestinian conflict. I can point to several specific examples that highlight Mahmoud commitment to non-violent, respectful language and building an inclusive pro-Palestinian movement on campus.

My first interaction with Mahmoud was in March 2023. Over the prior winter break, I participated in a trip to the Occupied Palestinian Territories organized by PalTrek National. As a follow-up to the trip, a discussion was convened with participants of the trip to highlight our experience. I offered to speak about my experience as a Jewish person who has traveled to Israel on multiple occasions before this trip. I was honest about my participation in Birthright International, a fully-funded trip for American Jewish youth to experience Israel. Birthright has received criticism from anti-Israel groups for its support of resettling American Jews to Israel, often at the expense of Palestinian families. While some students at SIPA expressed valid concerns about including my experience over others from the trip, Mahmoud personally welcomed my inclusion in the panel. Mahmoud saw the importance of including my voice in this discussion and highlighting the complicated pressures on American Jews. Mahmoud, starting at SIPA in January, did not participate in the trip and did not know me beyond my identity as

Jewish and previous participant in Birthright. Instead of leaning into stereotypes or succumbing to the pressures of others, Mahmoud saw me as a human being with a long and complicated relationship to my religious identity and its connection to the state of Israel.

The next incident I'd like to highlight occurred in October 2023. Following the Hamas-led terrorist attacks on October 7th and subsequent military response by Israel, the Dean of SIPA, Keren Yarhi-Milo, asked to meet with some SIPA students to understand the impact of the war on Palestinian students. Mahmoud was in attendance. Mahmoud began the meeting by asking Dean Yarhi-Milo, an Israeli citizen, how she, her family and community were doing in light of the terrorist attack. In asking the question, Mahmoud condemned the violent, hateful act by Hamas terrorists and expressed grief for the immediate loss of life and continued impact on the communities. Even Dean Yarhi-Milo appeared touched by the question and expressed gratitude for his consideration of her experience of this violence as an Israeli woman.

From October 2023, tensions on campus elevated. I've watched Mahmoud on several occasions de-escalate tense situations on campus, leading with peace to usher a constructive dialogue rather than inciting aggression that leads to hate speech. I saw Mahmoud, as well as other Arab classmates, confronted and, at times, harassed by other students, asking him if he supported Hamas. Mahmoud would not raise his voice or respond with aggression, but instead simply answer the question by condemning Hamas and all forms of violent extremism. Mahmoud recognized this was a tactic to coerce him to promote hateful or extremist language, but he never wavered in his denouncement of all forms of violent extremism, including the actions of Hamas on October 7th.

On October 25th 2023, over 20 students, including myself, were targeted in a doxing campaign by the right-wing media organization, Accuracy in Media. The organization launched an online petition, personal website for each student, and paraded a billboard truck around campus displaying my name and photo under the banner, "Columbia's Leading Antisemite." The false statement was attributed to my position as the President of SIPA's Human Rights Working Group. Mahmoud, not targeted at that time by this doxing campaign, reached out to me personally to check in on my well-being. He recognized that my identity and work experience with Jewish organizations contradicted the claim of antisemitism, and offered his support. He expressed his support not in justification of antisemitism, but as defamatory action to distract from legitimate antisemitism happening on campus, saying to me, "by targeting the Jewish student and ignoring the very real antisemitism happening on campus, [Accuracy in Media] has made it clear their motives are not to protect Jewish people."

I can point to additional incidents that occurred in April 2024 during the Solidarity Encampment at Columbia University. During the Encampment, Mahmoud led community-wide discussions on how to ensure the space was free from hate and discrimination. Through this, he helped develop

community guidelines for the encampment that indicated any expression of hate speech will not be tolerated. On one occasion, some individuals made remarks that I personally found offensive as a Jewish person. I saw Mahmoud visibly uncomfortable, and instead of berating or verbally attacking the individuals, he approached them calmly to deescalate the situation by saying, “that’s not a productive approach. We need to focus on law, not emotion.” His priority has always been advocacy through nonviolent means, centering facts, legal arguments, and mutual respect.

ICE may attempt to use his participation in the Encampment protest against him, but that would be a complete distortion of reality. Mahmoud has actively included Jewish voices in conversations about Israel-Palestine. In fact, during the first day of Jewish Holy Days of Passover, I asked Mahmoud for his help in hosting a Passover Seder at the Encampment specifically for a non-Jewish audience. Mahmoud was very helpful in connecting me with the leadership of the Encampment and ensuring I had a large, safe space to host the Seder. Not only did he attend the Seder, Mahmoud invited his non-Jewish friends, understanding the importance of including non-Jews in the celebration of this Holy Day. Following the Seder, he commented to me directly, “thank you for hosting and inviting me to this Seder. It was my first time being invited to a Passover Seder and I am very thankful to have learned more about Judaism.” His gratitude and support of this initiative further highlights his understanding of the value of including Jewish voices in typically non-Jewish spaces. In that moment, Mahmoud saw me, not just as a Jew but as a fellow human being equally committed to his message of nonviolence and peace.

Additionally, ICE and Federal officials may penalize Mahmoud for his visibility during Columbia’s protests because he was selected as a press representative from the student negotiating team. Only specific students were selected for these roles to ensure the peaceful purpose of the protests were expressed calmly and without hatred. I watched him on several occasions be tested by the press with leading questions that sought to charge the conversation with antisemitic or extremist messaging, and Mahmoud maintained his calmness, commitment to promoting peace on campus and sensitivity to hateful or extremist rhetoric. His role as a student negotiator underscores his commitment to finding a peaceful end to the Encampment through dialogue with Columbia’s administration.

I trust these examples provide insight into Mahmoud’s character and context to his participation in nonviolent protests that may be weaponized against him. His commitment to peaceful dialogue, particularly the creation of interfaith spaces, exemplifies what I have personally witnessed: Mahmoud has never engaged in or expressed support for antisemitic nor extremist ideology. He is an incredible advocate, good-faith member of the Columbia Alumni community, and a kind human being. I urge you to support his immediate release.

I DECLARE UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON 3/19/2025

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thank you for your time and consideration. I sincerely appreciate the Court's attention to this matter. If the Court requires any further information, I can be reached at the contact information above.

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street, New York, NY

Dear Judge Furman,

I am writing in support of Mahmoud Khalil. My name is [REDACTED] and I am an American Jewish woman who believes in the importance of Israel as a Jewish homeland. I have known Mahmoud Khalil for over two years, since January 2023 as his professor, colleague, and friend. I have always known Mahmoud as someone working to be part of the solution towards a peaceful resolution to the conflict in Palestine and Israel. He is committed to peaceful development which is also what our graduate program – the Master of Public Administration in Development Practice (MPA-DP)– trains students on.

I have known Mahmoud in my capacity as his Professor at Columbia University for two semesters (Spring 2023 DP-Lab I and Fall 2023 DP-Lab II courses), and then as his supervisor in his role as a Teaching Assistant for the course DP-Lab II: Organizational Management (Fall 2024). In between semesters I also interacted with Mahmoud, due to his role as a Program Assistant for the MPA-DP program which I am affiliated with as a Professor and alumna.

I have worked with Mahmoud and directly seen and graded his work. This work has demonstrated a deep and persistent commitment to humanitarian principals and doing work that contributes to peace and stability. Both semesters when he was my student, he focused his semester long project assignments on a non-profit organization (Jusoor, where he also previously worked) providing education services to refugees. I had many conversations with him about how to deepen educational impact and ensure that refugees would have real economic opportunities to escape cycles of violence and poverty.

When it came time to choose a Teaching Assistant for the Fall 2024 iteration of the course, I sought out Mahmoud to apply to the position. His deep expertise with organizational management with international development organizations, his high standards for quality work, as well as his integrity were all reasons I thought he would make a great TA. He effectively served the class and students throughout the semester even as he navigated both global and campus events that were directly impacting him and his family.

I can state with full confidence that Mahmoud has never expressed support for Hamas, nor has he ever endorsed any form of extremism. Over the course of our extensive interactions, I have had numerous conversations with him about human rights, justice, and the student protests and I can personally attest to his commitment to nonviolence.

In terms of the campus protests, Mahmoud was my student as these events unfolded and was in the process of being hired as our Teaching Assistant as the encampment was being established. I directly spoke to him about the encampment and Mahmoud

emphasised the protesters commitment to peace and non-violence. Mahmoud explained how the student movement was ensuring that Jewish voices were part of conversations and space. He was committed to dialogue and partnership with Jewish voices throughout his time on campus, one example of this was sharing a Jewish Sukkot event with me that he was attending put on by Jewish and Palestinian students on October 16th, 2024.

As our TA in Fall 2024 for a course for which Leadership was a key theme, he clearly spoke about the challenges of being seen as a leader of leaderless student movement. Many things have been incorrectly attributed to him in the media.

Mahmoud has always worked to be part of the solution towards a peaceful resolution to the conflict in Palestine and Israel. He is committed to peaceful development which is also what our graduate program – the Master of Public Administration in Development Practice – trains students on. Choosing to do this program, which trains students for public sector and public interest work also demonstrates his commitment to these issues. Everything he has ever worked on professionally and academically demonstrates his commitment to humanitarian principals including justice, peace, and development.

[REDACTED]

[REDACTED], March 14th, 2025

Lecturer at Columbia University's School of International and Public Affairs in the Master of Public Administration in Development Practice (DP-Lab I and II Courses)

[REDACTED]

[REDACTED] 7

[REDACTED]

[REDACTED]

[REDACTED]

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street, New York, NY

Dear Judge Furman,

My name is [REDACTED] and I am writing this letter in support of Mahmoud Khalil. I am currently a junior at Columbia University. I grew up in Forest Hills, Queens, raised by my Jewish mother and my American father. From a young age, I was taught the importance of higher education in shaping a well-rounded individual. My father, Brian Jones, exemplified this belief—he graduated from Harvard in 1993, becoming the first in our family to attend an Ivy League institution.

Judaism has always been central to my identity. I attended Jewish preschool, went to Hebrew school multiple times a week until my Bar Mitzvah in 2017, celebrated Shabbat every Friday, and was raised with strong Jewish values. I emphasize this not to exaggerate or embellish, but to paint a clear picture of who I am. My Jewish identity is deeply meaningful to me, and in these past 16 months—an incredibly difficult time for the Jewish people—having a strong support system of kind, understanding, and respectful individuals has been more important than ever. Mahmoud is exactly that.

From the moment I met Mahmoud 16 months ago, he has been nothing short of a selfless friend and an inspiring mentor. I clearly remember one of our first encounters at a peaceful rally on October 12, 2023. Despite how such events are often misrepresented in the media, this rally was a calm and peaceful demonstration in support of Palestinian rights. Mahmoud took on a protective security role that day, ensuring students were safe from any physical or verbal threats. When people hurled insults and profanities at me and my classmates, Mahmoud was the first to step in and de-escalate the situation. He never raised his voice, never used harsh language, never resorted to aggression—he spoke calmly and respectfully, shielding students, including me, a Jewish student, from harm. He put himself between me and an aggressor, prioritizing my safety over his own. That is not the behavior of an antisemite—that is the behavior of an ally and a friend.

In the weeks that followed, I spent many late nights with Mahmoud at friends' apartments, getting to know him and hearing his incredible story—one that led him to work at the U.N. During this time, he also began attending Shabbat dinners I hosted with my friends. He would often bring a dish or a bottle of kosher wine to contribute, embracing the tradition with genuine curiosity and respect. He actively listened to the prayers, enthusiastically engaged with Jewish culture, and always approached our traditions with kindness.

At a later protest in November, I witnessed firsthand Mahmoud's unwavering commitment to protecting Jewish students. When an unaffiliated individual began shouting antisemitic slogans, Mahmoud was the first to intervene, immediately de-escalating the situation and ensuring the safety of those present. This came as no surprise—I already knew that Mahmoud was someone I could trust to stand up for me and my community.

Over the months, our friendship deepened. We shared meals, laughs, and countless memories. Mahmoud was not just a source of strength and support in my life but in the lives of so many others. He was always there—a shoulder to cry on, a friend to lean on, and a wise and compassionate presence in our community.

Mahmoud has done nothing that I have not done. He has committed no crime, nor has he ever advocated for anything that I have not also stood for. For that reason, I urge you to support his release.

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Friday, March 14th

Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Centre Street New York

Dear Judge Furman,

My name is [REDACTED], I am a Jewish student at Columbia University writing in support of my friend, Mahmoud Khalil. I am writing this letter because I know that if I ever needed him to do it for me, he would, and so much more, because that's the kind of person Mahmoud is. We know each other through sharing space more times than I can count, at protests and at community events and at concerts and Shabbats. He is someone who I trust implicitly. He is someone who always puts himself between those around him and danger, and he does it without thinking and without flinching. He does it even with people who he doesn't know well. We're not best friends but I know that if I was in danger, Mahmoud would do everything in his power to protect and help me—as lead negotiator during the encampment this is exactly what he did, protecting me and so many other student protestors who were being punished for speaking up against genocide. This letter is the least I can do for someone who has always selflessly and courageously put others before himself. I can't believe that it's precisely because of these incredible qualities he is being punished in this way. Mahmoud has protected Jewish students at Columbia like myself more than the university ever has. He has even protected us from the university itself. To punish him under the pretence that this kind, brave, gentle person somehow endangered us is the most egregious lie I've ever heard. His strength is only matched by his calmness even in the most stressful circumstances. I've never heard him raise his voice except at protests. I can't describe the sense of immediate comfort that one felt in his presence, and every minute I think of him detained, it hurts.

Please help Mahmoud.

EXECUTED ON Friday March 14th

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



Society for International Development
United States

Ms. Shezza Abboushi Dallal
Staff Attorney
CLEAR
2 Court Square
Long Island City, NY
11101
Email: [REDACTED]

April 20, 2025

SUBJECT: Participation of Mahmoud Khalil in Society for International Development, United States Chapter 2020 Conference

Dear Ms. Abboushi Dallal,

The Society for International Development, United States Chapter (SID-US) is a nonpartisan, non-lobbying, nonprofit corporation incorporated in the District of Columbia dedicated to the advancement of sustainable, effective development worldwide since 1957. SID-US serves as a global town square to convene practitioners, thought leaders, and public and private institutions.

In response to your request for information regarding Mr. Mahmoud Khalil's participation in SID-US events, I write to advise you that Mr. Khalil spoke at our 2020 Annual Conference in his capacity of Program Manager at the Syria Office in the British Embassy in Beirut, where, according to the bio we were provided, he lead the Syria Chevening Program. Mr. Khalil has not been invited by SID-US to speak or participate at any SID-US event in any capacity before or since our 2020 Annual Conference.

Sincerely,

Katherine Raphaelson
President
Society for International Development, United States Chapter



United Nations Relief and Works Agency
for Palestine Refugees in the Near East

وكالة الأمم المتحدة لإغاثة
والعمل للاجئين الفلسطينيين في الشرق الأدنى

representative office
new york

two united nations plaza,
room 0205
new york, n.y. 10017
usa

t: +1 212 963 2255

www.unrwa.org

New York, 22 April 2025

To Whom it May Concern:

Mr. Mahmoud Khalil served as an intern at the UNRWA Representative Office in New York, on a full-time basis from 7 June to 31 August 2023 and on a part-time basis from 1 September to 30 November 2023 to allow for the continuation of his studies at Columbia University. The internship was an unpaid voluntary position in accordance with the practice of the Agency.

Gréta Gunnarsdóttir
Director
UNRWA Representative Office

المكتب التمثيلي
نيويورك

مبنى الأمم المتحدة ٢
(بلازا ٢)
غرفة رقم ٢٠٥
نيويورك، نيويورك ١٠٠١٧
الولايات المتحدة الأمريكية

ف +١ ٢١٢ ٩٦٣ ٢٢٥٥

CERTIFICATE OF SERVICE

On April 23, 2025, I, Johnny Sinodis, caused the enclosed document to be served on the U.S. Department of Homeland Security via the EOIR Courts and Appeals System (ECAS). This document was electronically filed through ECAS and both parties are participating in ECAS. Therefore, there is no separate service completed.

Executed this 23rd day of April 2025.

A handwritten signature in blue ink, appearing to be 'JS' or similar, written in a cursive style.