

# Exhibit C

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Mahmoud KHALIL,

*Petitioner,*

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Yolanda PITTMAN, in her official capacity as Warden of Elizabeth Contract Detention Facility; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

*Respondents.*

Case No. 25-cv-01963  
(MEF-MAH)

**DECLARATION OF  
JOHNNY SINODIS**

**DECLARATION OF JOHNNY SINODIS**

I, Johnny Sinodis, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a partner at Van Der Hout LLP, which is located at 360 Post Street, Suite 800, San Francisco, CA 94108. I have personal knowledge of the matters stated herein. I am one of Mr. Khalil's attorneys who is representing him in the above captioned-matter before this Court and also the Immigration Court. I have been practicing immigration law since December 2011.
2. I write to provide the Court additional relevant information and updates on Mr. Khalil's removal proceedings in Immigration Court.
3. As the Court is aware, on March 17, 2025, nine days after the U.S. Department of Homeland Security (DHS) arrested and detained Mr. Khalil pursuant to the Rubio Determination, DHS asserted for the first time that he is removable from the United States pursuant to 8 U.S.C. § 1227(a)(1)(A) because, per DHS, he was inadmissible under 8 U.S.C. § 1182(a)(6)(C)(i) when he adjusted his status to that of a lawful permanent resident (i.e., a green card holder) for

allegedly failing to disclose: (1) he was “a member of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA) from June through November 2023, as a political affairs officer” (Allegation 6); (2) his alleged “continuing employment as a Program Manager by the Syria Office in the British Embassy in Beirut beyond 2022” (Allegation 7); and (3) he was “a member of the Columbia University Apartheid Divest (CUAD)” (Allegation 8).

4. The alleged “failure to disclose” occurred in March 2024 when Mr. Khalil completed and filed his Form I-485, Application to Register Permanent Residence or Adjust Status, with the U.S. Citizenship and Immigration Services (USCIS). The Form I-485 is also commonly referred to as a “green card application.” Mr. Khalil signed his Form I-485 on March 26, 2024, and mailed it to USCIS on March 29, 2024.
5. DHS asserted these additional allegations and the additional § 1227(a)(1)(A) charge of removal via a Form I-261, Additional Charges of Inadmissibility/Deportability. *See* Form I-261 dated Mar. 17, 2025 (Allegations 6 through 8).
6. Under longstanding precedent from the Board of Immigration Appeals (BIA), DHS must prove by clear and convincing evidence that an alleged misrepresentation was willful, material, and made with the intent to deceive to establish inadmissibility under § 1182(a)(6)(C)(i) and removability under § 1227(a)(1)(A).<sup>1</sup>
7. DHS’s Form I-261 does not assert that any of Mr. Khalil’s alleged “failure[s] to disclose” at the time he applied for his green card were willful, material, or done with the intent to deceive. As discussed below, at the outset of the May 22 hearing in Immigration Court, the Immigration Judge dismissed Allegation 7. During the hearing, Mr. Khalil testified, as relevant here, in response to allegations 6 and 8, and DHS did not cross-examine him on this testimony. In the parties’ closing arguments submitted to the Immigration Court on June 2, DHS did not reference or address Allegations 6 and 8.

**Removal Proceedings as to the § 1227(a)(1)(A) Charge:**

8. On April 8, 2025, the Immigration Judge (IJ) ordered DHS to submit all evidence in support of its allegations against Mr. Khalil by April 9, 2025.
9. On April 9, 2025, DHS submitted documents in Immigration Court in support of their

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<sup>1</sup> I am providing the following BIA decisions as a reference for the Court: *Matter of G-G-*, 7 I&N Dec. 161, 164 (BIA 1956) (for immigration purposes, the term fraud “is used in the commonly accepted legal sense, that is, as consisting of false representation of a material fact made with knowledge of its falsity and with intent to deceive the other party.”); *Matter of Y-G-*, 20 I&N Dec. 794, 796 (BIA 1994) (material misrepresentation requires: (1) the person procured, or sought to procure a benefit under U.S. immigration laws; (2) the person made a false representation and the false representation was willfully made; (3) the false representation was material; and (4) the false representation was made to a U.S. government official); *Matter of D-R-*, 27 I&N Dec. 105, 107 (BIA 2017) (a finding of a willful, material misrepresentation must be based on “clear, unequivocal, and convincing evidence.”).

allegations that Mr. Khalil failed to disclose information on his March 26, 2024, Form I-485. The following documents correspond to these allegations:

- (a) a screenshot of a website showing Mr. Khalil as a speaker at a conference for the Society for International Development (SID) in 2025 and erroneously stating he works at the Syria Office in the British Embassy in Beirut;
  - (b) tabloid articles and blog posts dating between April 26, 2024, and March 11, 2025, which (a) erroneously state that Mr. Khalil's LinkedIn profile reflected that he was employed as a political affairs officer with UNRWA from June to November 2023 and (b) falsely claim Mr. Khalil was the leader of CUAD, while also providing no supporting evidence;
  - (c) several articles describing Mr. Khalil as the negotiator on behalf of all student protestors involved in Columbia University's encampment; and
  - (d) the "About Us" page from UNRWA's website, describing its work assisting Palestinian refugees.
10. On April 11, 2025, Mr. Khalil submitted evidence to the Immigration Court refuting DHS's allegations and evidence. *See Exhibit 1* (Mr. Khalil's submission of documents on April 11, 2025).<sup>2</sup>
11. On April 11, 2025, as relevant here, the IJ issued an order giving both parties until April 23, 2025, to file any additional evidence on the § 1227(a)(1)(A) charge of removal.
12. DHS did not file additional evidence on or before April 23, 2025.
13. On April 23, 2025, Mr. Khalil filed additional documents with the Immigration Court further refuting the charge that he willfully failed to disclose material information on his Form I-485 or made a false representation with an intent to deceive the U.S. government. *See Exhibit 2* (Mr. Khalil's submission of documents on April 23, 2025).<sup>3</sup>
14. Mr. Khalil's evidentiary submissions on April 11, 2025, and April 23, 2025, included the following documents:
- (a) In Opposition to Allegation 6 regarding UNRWA: (1) a letter from UNRWA to Columbia University, confirming that Mr. Khalil was an unpaid intern at UNRWA and that the internship was approved by Columbia University; (2) a letter from the Associate Director of Mr. Khalil's master's program at Columbia University, dated April 10, 2025, confirming that Mr. Khalil completed his internship with UNRWA for

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<sup>2</sup> On April 13, 2025, Mr. Khalil submitted the full record of immigration proceedings, to date, to the Court. *See* ECF 199. He reattaches his submission from April 11, 2025, discussed herein for ease of the Court's review as **Exhibit 1**.

<sup>3</sup> The April 23, 2025, immigration court evidence was previously filed with the Court as ECF 210-1 and is reattached here for ease of the Court's review as **Exhibit 2**.



- course credit at Columbia; (3) a printout of Mr. Khalil's LinkedIn profile, demonstrating that his role at UNRWA was publicly disclosed and was listed as an internship (not employment, as the tabloid article filed by DHS alleged); and (4) a letter from the Director of the UNRWA Representative Office confirming that Mr. Khalil served as an unpaid, voluntary intern at UNRWA between June 2023 and November 2023.
- (b) In Opposition to Allegation 7 regarding the British Embassy: (1) Evidence Regarding Mr. Khalil's participation in the SID conference in 2020—not 2025, as inaccurately portrayed in a screenshot submitted by DHS; (2) Mr. Khalil's contract with the British Embassy showing an end date in November 2022; (3) a letter from Mr. Khalil's colleague and the head of the office at the British Embassy, confirming he left the British Embassy in December 2022; and (4) a Letter from SID confirming Mr. Khalil is not a speaker in 2025.
- (c) In Opposition to Allegation 8 regarding CUAD: (1) a letter from a professor at Columbia University confirming Mr. Khalil was not a member of CUAD but in fact a negotiator on behalf of all students involved in the encampment, who liaised between the students and the administration; (2) a letter from a University Senator at Columbia confirming Mr. Khalil was not a member of CUAD; and (3) letters of support from Columbia students explaining Mr. Khalil's role as a negotiator on behalf of all students.
15. On April 25, 2025, the IJ scheduled an Individual Calendar Hearing (the equivalent of a trial in Immigration Court) for May 22, 2025, at 8:30 a.m.
16. On May 12, 2025, DHS filed a motion to pretermite Mr. Khalil's applications for asylum and for withholding of removal, arguing that there are reasonable grounds to believe that he is a danger to the security of the United States. *See* 8 U.S.C. §§ 1158(b)(2)(A)(iv), 1231(b)(3)(B)(iv). As support for this argument, DHS alleged that, because Secretary of State Marco Rubio had determined Mr. Khalil's presence in the United States to be adverse to a compelling foreign policy interest, he is also a danger to the security of the United States.
17. On May 19, 2025, Mr. Khalil filed an opposition to DHS's motion to pretermite.
18. At the outset of the hearing on May 22, 2025, the IJ orally stated that, based on the evidence in the record, DHS could not sustain the allegation that Mr. Khalil had failed to disclose that he worked at the British Embassy after December 2022. *See* Form I-261 at Allegation 7. The IJ did not provide a ruling on the other two allegations—Allegation 6 and 8.
19. The IJ also orally stated that she denied DHS's motion to pretermite Mr. Khalil's applications for asylum and for withholding of removal, rejecting DHS' argument that she should find him a danger to the security of the United States.
20. During his testimony at the May 22 hearing, as relevant here, Mr. Khalil provided further explanation for why the Form I-261's allegations regarding UNRWA and CUAD lacked

merit.<sup>4</sup>

21. As to UNRWA, Mr. Khalil testified that: (1) he received a stipend from Columbia University for his internship at UNRWA; (2) that he was paid directly by Columbia University; and (3) that he was never employed by UNRWA. He testified that, as part of his internship at UNRWA, he was required to submit reports to Columbia and author blog posts about his experience for the school. He testified that his supervisor at UNRWA was also required to submit a report to Columbia. Mr. Khalil disclosed his employment with Columbia University on his Form I-485, which necessarily included his internship at UNRWA. Because Columbia was his employer during his internship with UNRWA, Mr. Khalil understood that disclosing his employment at Columbia included that internship role. Mr. Khalil further testified that it is his understanding that, in June 2023, the U.S. Department of State was notified of his internship with UNRWA. Mr. Khalil explained that he relied on the guidance in the Form I-485 instructions, which do not mention internships, to complete the application. He further testified that individuals cannot be members of UNRWA, as membership of UNRWA is reserved for nation-states.
22. When DHS had the opportunity to cross-examine Mr. Khalil about his internship at UNRWA and the documentary and testimonial evidence he provided about the information on his Form I-485, DHS did not ask him a single question.
23. As to CUAD, Mr. Khalil testified that all of the purported evidence DHS filed in support of its allegation—that he willfully failed to disclose “membership” in CUAD on his March 2024 green card application—concerns alleged activity that took place in April 2024, nearly a full month *after* he submitted his Form I-485.
24. He further testified that he was never a member or a leader of CUAD. He testified that, to the best of his knowledge, CUAD is not an individual member organization and did not have a formal leadership. CUAD was comprised of over 120 different groups that ranged from those focusing on Palestine, to a climate club and a dance club. Mr. Khalil testified that, CUAD is just that—a coalition of existing groups, not a free-standing individual membership group—and that, as far as he is aware, CUAD operated without any hierarchy, leadership, or structure. Mr. Khalil further explained that, when protests began at Columbia—nearly three weeks after he submitted his Form I-485—faculty at Columbia reached out to him to act as a negotiator. Mr. Khalil explained how faculty approached him specifically because they wanted someone who was NOT part of the student groups leading the protests, as well as someone like Mr. Khalil who was trusted by the administration, students, and faculty, and who had experience with diplomacy and negotiation. Contemporaneously, students in Columbia’s encampment—which encompassed many students other than those affiliated with CUAD—also asked him to act as a negotiator. Mr. Khalil agreed to do so, and he began to go back and forth between the administration and the students. He relayed the positions of the administration to the hundreds of students in assembly-style meetings. The students then voted on their collective position by

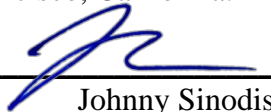
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<sup>4</sup> In addition to testifying as to the meritless of the second charge of removal, Mr. Khalil also presented his own testimony and the testimony of four expert witnesses in support of his applications for asylum, withholding of removal, and protection under the Convention Against Torture.

raising their hands to vote. Mr. Khalil would then take their collective decision back to the administration.

25. DHS had the opportunity to cross-examine Mr. Khalil about his alleged membership in CUAD and the documentary and testimonial evidence he provided about the information on his Form I-485 but again did not ask him a single question about this allegation or his testimony contradicting it.
26. At the close of the May 22 hearing, the IJ ordered both parties to submit written closing arguments by June 2, 2025, at 5:00 p.m. Central Time.
27. The parties filed their respective closing arguments on June 2, as the IJ ordered. DHS's written closing argument did not dispute any of Mr. Khalil's testimony nor the evidence submitted by him as to the second charge of removal, all of which showed that the § 1227(a)(1)(A) could not stand. In fact, DHS did not discuss in any way or even mention the § 1227(a)(1)(A) charge of removal, conceding, for all intents and purposes, that the § 1227(a)(1)(A) charge cannot be sustained.

I declare under penalty of perjury that the foregoing statement is true and correct to the best of my own personal knowledge. Executed this 4th day of June 2025 at San Francisco, California.

  
\_\_\_\_\_  
Johnny Sinodis  
Declarant

# EXHIBIT 1

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: April 11, 2025

Hearing Time: 1:00 p.m.

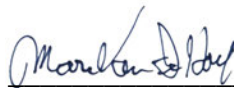
Before: Hon. Judge Jamee E. Comans

**DOCUMENT LIST FOR MR. KHALIL'S HEARING ON APRIL 11, 2025**

Respondent, Mr. Mahmoud KHALIL, [REDACTED], through counsel, hereby submits attached Exhibits A through L. He reserves the right to amend and supplement this documentation prior to and at his Hearing scheduled for April 11, 2025, at 1:00 p.m.

Dated: April 11, 2025

Respectfully submitted:



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

Attorneys for Mr. Khalil

EVIDENCE REFUTING ALLEGATIONS OF ANTISEMITISM IN THE RUBIO  
MEMORANDUM

- A. “Columbia has pushed an anti-Palestinian narrative, lead student negotiator tells CNN,” CNN (Apr. 29, 2024), available at <https://www.cnn.com/business/live-news/university-protests-palestine-04-29-24/index.html> .....1

*Khalil was also asked what he would say to Jewish students who feel unsafe on campus. “I would say that the liberation of Palestine and the Palestinians and the Jewish people are intertwined. They go hand in hand. Anti-Semitism and any form of racism has no place on campus and in this movement,” Khalil said, noting that some members of Columbia’s encampment are Jewish and held Passover seders earlier this week, led by Jewish Voices for Peace. “They are an integral part of this movement,” Khalil said of the organization.*

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

- B. Letter from UNRWA New York to the Assistant Director, Master of Public Administration in Development Practice (MPA-DP), the School of International and Public Affairs, Columbia University, dated May 17, 2023 .....3

*I am pleased to inform you that SIPA student, Mahmoud Khalil, has been selected for an internship at the Representative Office of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA) in New York. We are looking forward to welcome Mahmoud to our team. The internship is unpaid and will have a duration of three months. It is expected to commence on 1 June to 31 August on a full-time basis; Mahmoud will transition to a part-time schedule from 1 September until 30 November to allow for the continuation of his studies.*

- C. Letter from Associate Director and Adjunct Associate Professor, Master of Public Administration in Development Practice, School of International and Public Affairs, Columbia University, dated April 10, 2025 .....5

*I certify that, as part of the MPA-DP [Master of Public Administration in Development Practice] core curriculum, Mahmoud Khalil concluded his 3.0 credit 12-week summer placement, in 2023, at the United Nations Relief and Works Agency (UNRWA). The MPA-DP program trains aspiring practitioners to understand, develop, and implement integrated approaches to sustainable development, emphasizing practical knowledge and skills. The core curriculum, in combination with internships such as this, provide students with a solid background in the theories and methods of development. As a supplement to coursework, skills training through internships equip students with the management, communication, quantitative, and analytical skills needed to work fluidly across disciplines and regions.*

D. Printout of Mr. Khalil’s LinkedIn profile, demonstrating that his role at UNRWA was publicly disclosed and was listed as an internship .....	7
E. Evidence of UNRWA USA’s 501(c)(3) status .....	12

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

F. 2020 Annual Conference Social Media Toolkit, Society for International Development, October 7-8, 2020, listing Mr. Khalil as a speaker.....	15
G. 2020 Annual Conference Schedule, Society for International Development, listing Mr. Khalil as a speaker on October 7, 2020 .....	20

**EVIDENCE DEMONSTRATING MR. KHALIL LEFT HIS EMPLOYMENT IN THE BRITISH EMBASSY IN DECEMBER 2022, AS STATED ON HIS FORM I-485**

H. Mr. Khalil’s signed Independent Contractor Agreement with the British Embassy in Beirut, showing his contract with the Embassy ended in December 2022 .....	25
I. Email from [REDACTED], British Embassy Beirut confirming that Mr. Khalil left his position at the Embassy in December 2022 .....	27

**EVIDENCE DEMONSTRATING MR. KHALIL WAS NOT A MEMBER OF COLUMBIA UNIVERSITY APARTHEID DIVEST (CUAD)**

J. Letter from [REDACTED] Professor at Barnard College and Columbia University .....	29
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*I am a Professor of [REDACTED] at Barnard College and Columbia University. I spent a lot of time at the encampment in the spring of 2024: I was there to observe and de-escalate the situation. I had many conversations with Mahmoud Khalil, as well as one conversation with members of the Columbia administration involved in the negotiations. I want to emphasize that Mahmoud Khalil’s involvement was not as a member of CUAD. As I understood it—and also as is my understanding from the Columbia administrators with whom I spoke—Mr. Khalil served as a negotiator between CUAD and other student protesters, on the one hand, and the Columbia administration, on the other. He was not a member of CUAD, but rather he was nominated as a person who could serve as a go-between between students and the university administration. Mahmoud Khalil’s role was to negotiate a peaceful solution between the encampment participants and the Columbia administration, in the hopes of avoiding inviting the New York City police department onto campus a second time.*





### **CERTIFICATE OF SERVICE**

On April 10, 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 10th day of April 2025.

TAB A

## Columbia has pushed an anti-Palestinian narrative, lead student negotiator tells CNN

From CNN's Samantha Delouya



Mahmoud Khalil speaks with CNN on Monday, April 29. CNN

In a conversation with CNN's Wolf Blitzer, Columbia student lead negotiator Mahmoud Khalil, discussed what he called an "anti-Palestinian narrative" at the school amid pro-Palestinian protests.

"Over the past six months, these students, they have witnessed the killing of over 34,000 Palestinians in Gaza and despite all of this, the institution, Columbia at least, has only pushed one narrative — an anti-Palestinian narrative on campus," Khalil said. "They feel that they are alienated. They feel that the university is very biased against them," he said of the protesters.

Khalil was also asked what he would say to Jewish students who feel unsafe on campus.

"I would say that the liberation of Palestine and the Palestinians and the Jewish people are intertwined. They go hand in hand. Anti-Semitism and any form of racism has no place on campus and in this movement," Khalil said, noting that some members of Columbia's encampment are Jewish and held Passover seders earlier this week, led by Jewish Voices for Peace.

"They are an integral part of this movement," Khalil said of the organization.



TAB B

New York, 17 May 2023



representative office  
new york

one un plaza  
room 1265  
united nations  
new york, n.y. 10017  
usa

+1 212 963 2255

[www.unrwa.org](http://www.unrwa.org)

Dear Ms. [REDACTED]

I am pleased to inform you that SIPA student, Mahmoud Khalil, has been selected for an internship position at the Representative Office of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA) in New York. We are looking forward to welcome Mahmoud to our team.

The internship position is unpaid and will have a duration of three months. It is expected to commence on 1 June to 31 August on a full-time basis; Mahmoud will transition to a part-time schedule from 1 September until 30 November to allow for the continuation of his studies.

The internship at the UNRWA Representative Office in New York provides a valuable opportunity to familiarize interns with the UN system and with substantive humanitarian, development and political issues. Mahmoud will be responsible for assisting with the smooth functioning of the Office, including:

- Attend meetings, briefings and other events at the UN related to the situation of Palestine refugees, including the monthly Security Council briefings on the Question of Palestine;
- Write reports of meetings; prepare a variety of documents, including letters, concept notes and talking points;
- Prepare monthly newsletters;
- Track international media and social media coverage of issues related to Palestine refugees and UNRWA;
- Assist in the preparation of UNRWA events and visits to New York by senior UNRWA officials;
- Assist with the effective administrative management of UNRWA's Representative Office in New York.

Should you require any further information please do not hesitate to contact us.

[REDACTED]

Director

[REDACTED]  
Assistant Director, Master's of Public Administration in Development Practice  
(MPA-DP)  
The School of International and Public Affairs, Columbia University

المكتب التمثيلي  
لنيويورك

امبلي الأمم المتحدة (للازل)  
غرفه رقم ١٢٦٥  
نيويورك، نيويورك ١٠٠١٧  
الولايات المتحدة الأمريكية  
Exh. 13 - Adm.  
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TAB C

COLUMBIA UNIVERSITY  
IN THE CITY OF NEW YORK  
SCHOOL OF INTERNATIONAL AND PUBLIC AFFAIRS

New York City, April 10, 2025

TO WHOM IT MAY CONCERN

This is to certify that Mahmoud Khalil successfully concluded an internship for 1.5 credit as part of his Master of Public Administration in Development Practice (MPA-DP) degree, at The Permanent Mission of the State of Palestine to the United Nations, during the spring semester of 2024.

Furthermore, I certify that, as part of the MPA-DP core curriculum, Mahmoud Khalil concluded his 3.0 credit 12-week summer placement, in 2023, at the United Nations Relief and Works Agency (UNRWA).

The MPA-DP program trains aspiring practitioners to understand, develop, and implement integrated approaches to sustainable development, emphasizing practical knowledge and skills.

The core curriculum, in combination with internships such as this, provide students with a solid background in the theories and methods of development. As a supplement to coursework, skills training through internships equip students with the management, communication, quantitative, and analytical skills needed to work fluidly across disciplines and regions.

Yours sincerely,

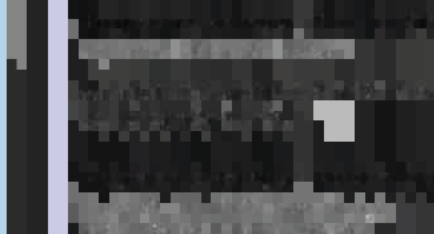
[Redacted Signature]

[Redacted Title]

Associate Director and Adjunct Associate Professor  
Master of Public Administration in Development Practice  
School of International and Public Affairs  
*Columbia University*

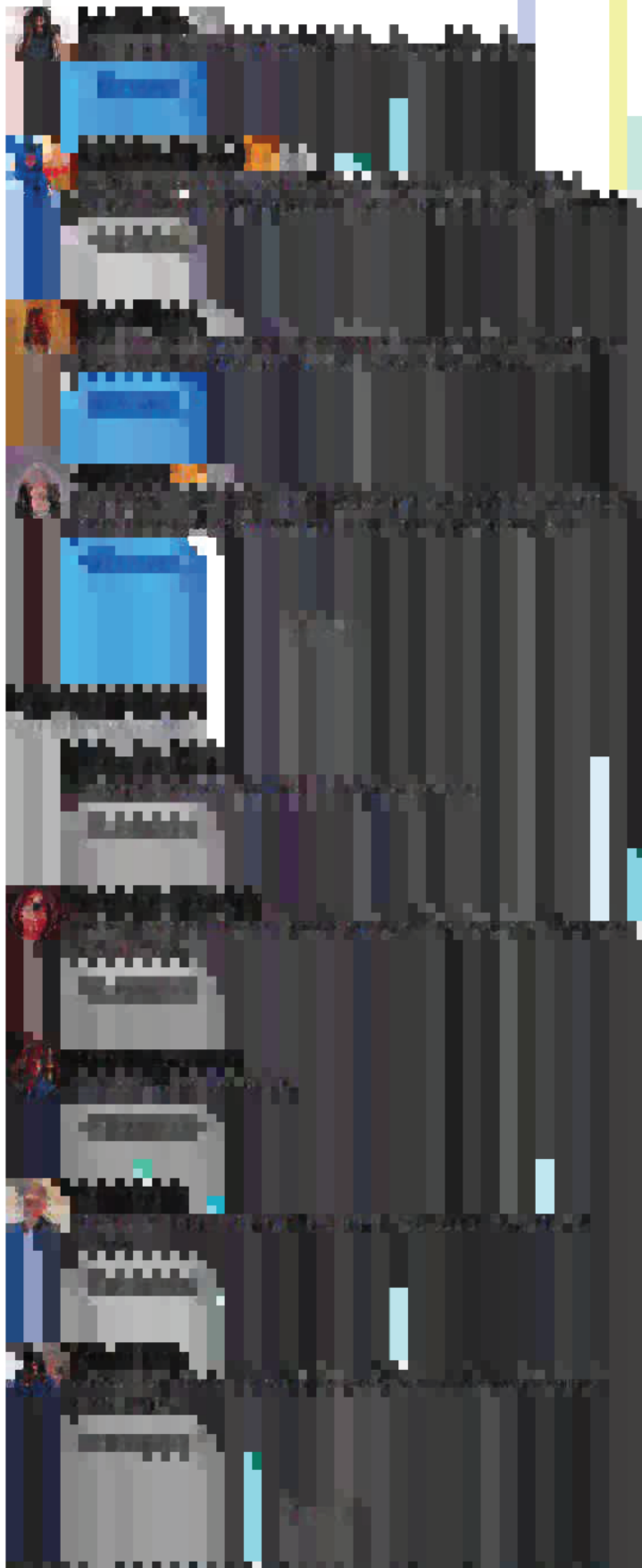


TAB D









TAB E

# Unrwa USA National Committee Inc.

EIN: 20-2714426 | Washington, District of Columbia, United States

## Other Names

UNRWA USA NATIONAL COMMITTEE INC

## Publication 78 Data

Organizations eligible to receive tax-deductible charitable contributions. Users may rely on this list in determining deductibility of their contributions.

**On Publication 78 Data List:** Yes

**Deductibility Code:** PC [?](#)

## Copies of Returns (990, 990-EZ, 990-PF, 990-T)

Electronic copies (images) of Forms 990, 990-EZ, 990-PF or 990-T returns filed with the IRS by charities and non-profits.

<a href="#">✓ Tax Year 2021 Form 990</a>
<a href="#">✓ Tax Year 2020 Form 990</a>
<a href="#">✓ Tax Year 2019 Form 990</a>
<a href="#">✓ Tax Year 2018 Form 990</a>
<a href="#">✓ Tax Year 2017 Form 990</a>

✓ Tax Year 2016 Form 990



TAB F



## 2020 Annual Conference Social Media Toolkit

**Date:** October 7-8, 2020

**About:** Join us on October 7 and 8 for **SID-Washington's first-ever virtual conference!** While we will miss gathering in person, we are super excited about moving our annual conference online. Join hundreds of other international development professionals to discuss and debate ideas, trends, and challenges facing our sector today. Focusing on our theme of **The Decade to Deliver**, we will examine what we need to do as a community to meet the Sustainable Development Goals by 2030.

Just like our in-person conference, we will have keynote addresses, plenaries, breakout sessions, and more. We will also have workshops, networking opportunities, and, of course, our ever-popular exhibit hall. And, unconstrained by physical space, we expect speakers and attendees from all over the globe. With our focus on networking, we will have innovative ways for you to interact with your peers from all sectors of development, including NGOs, contractors, the private sector, consulting firms, government agencies, universities, small businesses, large corporations, donors, and anyone else engaged in the important work of international development.

### Join the Conversation

Twitter: @sidwashington

Website: <https://www.sidwconference.org>

Hashtags:

- #SIDWConference
- #SIDWOnline
- #globaldev
- #VirtualConference
- #HappeningNow

LinkedIn: [Society for International Development, Washington Chapter](#)

Facebook: [Society for International Development, Washington Chapter](#)

Instagram: [@sidwash](#)

**Please use these social media platforms to spread the word to everyone in the development community about the Annual Conference!**

### Sample Tweets

Conference-Related

- Looking forward to speaking at the first-ever @SIDWashington #VirtualConference this week! Join me at the #SIDWConference for a full day of discussion about #globaldev issues, achieving SDG goals by 2030, and more! Register now: <https://www.sidwconference.org>
- Join me tomorrow at [time] to discuss [topic] at the 2020 #SIDWConference. Thank you for having me @SIDWashington <https://www.sidwconference.org/>

- #HappeningNow: The 2020 #SIDWConference is underway. I'll be speaking about [topic] and look forward to an engaging #SIDWOnline experience full of discussion, debate & networking with people engaged in #globaldev! <https://www.sidwconference.org>

## Sample LinkedIn Posts

- It is almost time for 2020 #SIDWConference! On October 7-8, I am excited to join other #GlobalDev professionals at the first-ever Virtual Society for International Development, Washington Chapter (SID-W) Conference! I'll be speaking about [topic] and I hope to see you there: <https://www.sidwconference.org/>

## Sample Facebook Posts

- Delighted to be able to talk about [topic] at the first ever virtual #SIDWConference. Registration is still open and you can be part of the conversation: [www.sidwconference.org](http://www.sidwconference.org)

## Annual Conference Speaker Twitter Handles and/or Organization:

### Day 1

#### Opening Plenary

- Fireside Chat with USAID Deputy Administrator Bonnie Glick
  - Keynote Speaker: Bonnie Glick - @USAIDBGlick, @USAID
  - Moderator: Wade Warren - @Deloitte, @DeloitteGov

#### AM Panels

- Panel 1 (People) - Building our Talent Pipeline for Diversity, Equity, and Inclusion
  - Moderator: Yvette Burton - @ycburtonphd, @NYUniversity
  - Tonija Hope - @HowardU
  - Carmen Mezzera - @apsiainfo
  - Uzra Zeya - @UzraZeya, @AfPeacebuilding
- Panel 2 (Planet) - Realizing the Circular Economy Advantage
  - Moderator: Wesley Spindler - @wesleyspindler, @AccentureStrat
  - Jon Angin - @TetraTechIntDev
  - Elissa Foster - @Pantagonia
  - David Stover - @BureoInc
- Panel 3 (Prosperity) - Delivering Economic Growth and Trade Support in the "New Normal"
  - Moderator: Masood Ahmed - @MasoodCGD, @CGDev
  - Jennifer Adams - @USAIDMozambique
  - Anabel Gonzalez - @\_AnabelG, @PIIE
  - Vasken Khabayan - @VKhabayan, @GAC\_Corporate
  - Gail Warrander - @GWarrander, @FCDOGovUK
- Panel 4 (Learning Lab) - How Effective Partnerships are Addressing the SDGs
  - Facilitator: Joanne Sonenshine - @jsonenshine, @conn\_impact

## Lunch Plenary

- Next Generation of Leaders and SDGs: Linking Local and Global for Systemic Change
  - Moderator: Jeffrey Caesar
  - Mahmoud Khalil - @FCDGovUK
  - Claire Sullivan - @univofdayton
  - Soazic Elise Wang Sonne - @WorldBank

## PM Panels

- Panel 1 (People) - Focusing on Women and Girls in COVID Response and Recovery
  - Moderator: Caren Grown - @CarenGrown, @WorldBank
  - Gary Barker - @Promundo\_US
  - Patricia Greene
  - Dr. Valerie Hudson - @BushSchool
- Panel 2 (Planet) - Environmental Implication of Infectious Diseases
  - Moderator: John Parker - @TetraTechIntDev
  - Hellen Amuguni - @tuftsvet
  - Patricia Bright - @USAID
  - Sabri Zain - @TRAFFIC\_WLTrade
- Panel 3 (Prosperity) - Local Leadership for Sustainable Urban Development
  - Moderator: Tony Pipa - @anthonypipa, @BrookingsGlobal
  - Yvonne Aki-Sawyerr - @yakisawyerr
  - Mauricio Rodas - @MauricioRodasEC
- Panel 4 (Learning) - Disrupting Racism through Communications
  - Facilitator: Jelena Hasbrouck - @Jelenyo
  - Chizi Igwe - @DalbergTweet

## Day 2

### Opening Plenary

- Sean Cairncross - @MCC\_CEO, @MCCGov
- Gloria Steele - @USAID

### AM Panels

- Panel 1 (People) - Strategies and Tools for Addressing Inequalities
  - Moderator: Carla Koppell - @CarlaKoppell, @GeorgetownU
  - Lucie Amadou - @counterpartint
  - Maitreyi Bordia Das - @DasMaitreyi, @WorldBank
  - Rosarie Tucci - @USIP
- Panel 2 (Reimagining Development) - Reimagining Development
  - Moderator: Roger Ford - @FRogerFord, @Accenture
  - Nicole Barnes - @RTI\_INTL\_DEV
  - Julie Becker - @Chemonics
  - Jeremy Kanthor - @DAIGlobal
  - Thomas Reilly - @TetraTechIntDev
  - Erin Uggen - @Nathan\_Inc
- Panel 3 (Innovation Showcase Q&A)

- Moderator: Nick Martin - @ncmart
- Panel 4 (Learning Lab)
  - Bobby Jefferson - @DAIGlobal
  - Jon Walton

#### PM Panels

- Panel 1 (USAID's Digital Strategy and the Decade to Deliver)
  - Moderator: Manisha Aryal - @Chemonics
  - Krista Baptista - @DAIGlobal
  - Craig Jolley - @JolleyWithAnE, @USAID
  - Michelle Parker - @USAID
- Panel 2 (Reimagining Development)
  - Moderator: Wade Warren, @Deloitte
  - Graham Couturier - @EqualAccessIntl
  - Bob Fries - @acdivoca
  - Olivier Girard - @1977Creative
  - Michele Laird - @Michele\_Laird, @abtassociates
- Panel 3 (Food Security)
  - Moderator: Sylvia Megret - @SylviaMegret, @acdivoca
  - Mark Castellino - @CastellinoMark, @OpportunityIntl
  - Jocelyn Brown Hall - @JocelynB\_FAO, @FAO
  - Tracy Mitchell - @RTI\_INTL\_DEV (Doesn't have her own account)
  - Lori Groves Rowley - @LGRowley1
- Panel 4 (Learning Lab)
  - Tosca Bruno-van Vijfeijken - @Tosca5Oaks

#### Closing Plenary

- Moderator: George Ingram - @BrookingsInst
- Sarah Mendelson - @SarahMendelson, @CarnegieMellon
- Shaun Mickus - @JNJGlobalHealth
- Eric Reading - @eric\_reading, @AbtAssociates
- Tessie San Martin - @Tessie\_Plan, @PlanUSA

TAB G

# Day 1

**Wednesday, October 7, 2020**

**10:00 AM - 3:00 PM (Eastern Time)**

Please note that the schedule is subject to change.

**10:00 - 10:55 AM (ET)**

## **Fireside Chat with USAID Deputy Administrator Bonnie Glick**

To kick off our first ever Virtual Annual Conference, USAID Deputy Administrator Bonnie Glick will join us for a fireside chat with SID-Washington incoming Board Chair Wade Warren to talk about priorities and challenges in international development during a pandemic and looking ahead to a post-COVID world. Following up on their

[discussion](#) at our 2019 Annual Conference, Bonnie and Wade will talk about how things have changed more than any of us could have imagined just a year ago and provide their thoughts on the way forward in unprecedented and challenging times.

### **Keynote:**

**[Bonnie Glick](#)** - Deputy Administrator, USAID

### **Moderator:**

**[Wade Warren](#)** - Board Chair, Society for International Development - Washington Chapter, Chief Strategy Officer for International Development, Deloitte Consulting and former Acting Administrator, USAID

**11:00 - 11:55 AM (ET)**

- Track 1: People
- Track 2: Planet
- Track 3: Prosperity
- Track 4: Learning Lab
- Other Features

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## **Building our Talent Pipeline for Diversity, Equity and Inclusion**

A diverse workforce and an inclusive climate are essential for ensuring organizations that thrive and deliver globally. This panel will discuss how to enable a diverse, healthy workforce for our field and within our organizations – why it's essential and how to cultivate and nurture talent.

**Moderator:**

**Yvette Burton** - Lead Faculty and Architect, Inclusion By Design Business Certification Program, New York University

**Speakers:**

**Tonija Hope** - Director, Ralph J. Bunche International Affairs Center, Howard University

**Carmen Mezzera** - Executive Director, Association of Professional Schools of International Affairs (APSIA)

**Uzra Zeya** - CEO and President, Alliance for Peacebuilding

**12:00 - 12:25 PM (ET)**

**Networking Lounges**

Want to meet others working on specific topic or issue? Stop by our networking lounge to meet SID-Washington Co-chairs and other attendees. Join a table on a topic that is of interest to you. Feel free to move around to multiple tables during this 25-minute session or stay at one the entire time. It's up to you!

The networking lounge will be open all day for you to informally mingle with others, but will only be facilitated by SID-W Co-Chairs during this 25-minute session.

**Other Ways to Network**

1. Visit the virtual exhibit hall.
2. Participate in the discussion boards and create your own topics for discussion.
3. Chat one-on-one with other attendees.
4. Stop by the networking lounge throughout the day to meet others.

**12:30 - 1:25 PM (ET)**

**Next Generation of Leaders and SDGs: Linking Local and Global for Systemic Change**

To deliver on the SDGs we need leadership at the local and global level. And we need to identify strategies and approaches for community engagement that build lasting results. Our panel of leaders working both globally and locally will explore how we can tap into the potential of new and innovative digital sources of data to track progress towards the SDGs. What are examples of effective strategies for community engagement? And how can artificial intelligence be deployed as a force for good to achieve the SDGs?

**Moderator:**

**Jeffery Caesar** - Campaign Director, 360 Campaign Consulting

**Speakers:**

**Mahmoud Khalil** - Program Manager, UK's Syria Office in Beirut

**Claire Sullivan** - Student Sustainability Leader, University of Dayton

**Soazic Elise Wang Sonne** - Young Professional (Economist), Social Development Global Practice, The World Bank Group

**1:30 - 2:25 PM (ET)**



- Track 1: People
- Track 2: Planet
- Track 3: Prosperity
- Track 4: Learning Lab
- Other Features

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&gt;

## Focusing on Women and Girls in COVID Response and Recovery

Women and girls are being disproportionately affected economically and socially by COVID-19, and they risk losing ground in the recovery. They are the majority of frontline workers in the response and they are losing jobs and income disproportionately, even as they assume the larger share of paid and unpaid care responsibilities, and face skyrocketing rate of gender-based violence. This panel will discuss the impact of COVID on efforts to foster gender equality and strategies for preventing long-term backsliding of efforts for equality.

### Moderator:

[Caren Grown](#) - Global Director, Gender, The World Bank

### Speakers:

[Gary Barker](#) - CEO and Founder, Promundo

[Patricia Greene](#) - Former Director, Women's Bureau, U.S. Department of Labor

[Valerie Hudson](#) - University Distinguished Professor, Bush School of Government and Public Service, Texas A&M University

**2:30 - 3:30 PM (ET)**

## Fireside Chat with Andrew Herscowitz, Chief Development Officer, DFC

### Keynote:

[Andrew Herscowitz](#) - Chief Development Officer, U.S. International Development Finance Corporation

### Moderator:

[Robert Mosbacher, Jr.](#) - Board Chair, Mosbacher Energy Company and Former President and CEO, Overseas Private Investment Corporation

## Keynote Address: David Miliband, International Rescue Committee

We will end our first day with a keynote address by International Rescue Committee (IRC) President and CEO David Miliband. David is leading IRC through extraordinarily difficult times and will comment on the challenges facing all of us and how he and IRC are navigating them.

**Keynote:**  
**David Miliband** - President and CEO, International Rescue Committee (IRC)

TAB H



British Embassy  
Beirut

01 November 2022

Private and Confidential

**Mahmoud Khalil**  
**British Embassy Beirut**

Dear Mahmoud,

**Re: Extension of Fixed Term Contract**

As you are aware your Independent Contractor Agreement as CSSF Syria Projects Manager at the British Embassy Beirut will end on 20 November 2022.

I am writing to confirm the extension of your Independent Contractor Agreement until 20<sup>th</sup> December 2022.

The terms and conditions of your employment will remain the same as per your original agreement.

Please confirm your acceptance by signing the acknowledgement receipt below and return it to the Human Resource Department, Corporate Services.

May I take this opportunity to thank you for your valued contribution to British Embassy Beirut.

Yours sincerely,

  
**Head of Corporate Service**



I hereby acknowledge receipt of the letter of appointment setting out the conditions for locally engaged staff at the British Embassy in Beirut. Having read and fully understood them, I agree to accept them as the conditions governing my employment at the British Embassy, Beirut.

Signed Mahmoud Khalil

Name in full Mahmoud Khalil

Date 12/11/2022

# TAB I

Sent: Friday, April 11, 2025 11:51:58 AM

To: [REDACTED]

Subject: Mahmoud Khalil Contract

OFFICIAL

To whom it may concern

I can confirm that Mahmoud Khalil ended his contract at the British Embassy Beirut in December 2022 in order to take up a scholarship at Columbia University. Mahmoud has not worked for the Embassy since, albeit he was an excellent and respected member of staff during his time here and also a worthy recipient of a scholarship.

Regards

[REDACTED]  
British Embassy Beirut  
+961 81 512 80

Follow us online: [www.gov.uk/fcdo](https://www.gov.uk/fcdo)

This email is intended for the addressee(s) only: All messages sent and received by the Foreign, Commonwealth & Development Office may be monitored in line with relevant [UK legislation](#)

OFFICIAL

TAB J

April 10, 2025

Executive Office for Immigration Review  
Immigration Court  
830 Pinehill Road  
Jena, LA 71342

Dear Sir/Madam,

I am a Professor of [REDACTED] at Barnard College and Columbia University. I spent a lot of time at the encampment in the spring of 2024: I was there to observe and de-escalate the situation. I had many conversations with Mahmoud Khalil, as well as one conversation with members of the Columbia administration involved in the negotiations. I want to emphasize that Mahmoud Khalil's involvement *was not as a member of CUAD*. As I understood it—and also as is my understanding from the Columbia administrators with whom I spoke—Mr. Khalil served as a negotiator between CUAD and other student protesters, on the one hand, and the Columbia administration, on the other. He was not a member of CUAD, but rather he was nominated as a person who could serve as a go-between between students and the university administration. Mahmoud Khalil's role was to negotiate a peaceful solution between the encampment participants and the Columbia administration, in the hopes of avoiding inviting the New York City police department onto campus a second time.

Best,

[REDACTED]

[REDACTED]



TAB K

April 10, 2025

TO: Executive Office for Immigration Review

Immigration Court

830 Pinehill Rd

Jena, LA 71342

To the Executive Office for Immigration Review,

I am writing to you today in defense of Mahmoud Khalil. My name is [REDACTED], and I am a graduate of Columbia [REDACTED] (2024). Before graduating in May 2024, I served as a University Senator, representing the [REDACTED] at Columbia University. In the 2023-2024 academic year, I was serving as a [REDACTED], and by virtue of that role I was a member of the Senate Executive Committee. It is through my work as a student leader within the University Senate (particularly in the context of the pro-Palestine protests and the ensuing injustices and controversies at Columbia) that I met, befriended, and interacted with Mahmoud. It is through that same work that I have firsthand knowledge of his relationship to Columbia University Apartheid Divest (CUAD).

The main point of this letter is to define what Mahmoud's role was as it relates to CUAD. Everything in this letter is from my personal experience and perspective of the 2023-2024 academic year. While I cannot speak for anyone else, any group, or any institution, I believe that my understandings of the situations and relationships that I discuss in this letter are opinions that are shared widely by most who know Mahmoud and anyone who interacted with him in the context of the student movement for Palestine at Columbia.

Mahmoud Khalil was not a member or a leader of CUAD. He was known by many, including myself, as a compassionate, diplomatic, intelligent, and passionate Palestinian student who advocated for his people and for the basic right to freedom of speech and protest. That is why protestors in the Columbia Encampment (also known as the Gaza Solidarity Encampment) asked Mahmoud to negotiate with the University on their behalf, and why he agreed to represent them at the negotiating table. I know this from my role as part of the University Senate delegation that mediated and observed the negotiations. Any allegation that Mahmoud was a member of CUAD is unequivocally false and has no basis in fact.

There were many parties involved with the Encampments on all sides, so here is a breakdown of the relevant groups:

1. Columbia Encampment (or the Encampment) - a non monolithic group of protestors who set up camp on the Columbia University lawn to demand, among other things, disclosure and divestment from companies involved in the oppression and killing of Palestinians. This included both members of CUAD and allies who were Columbia students not affiliated with CUAD.
2. Encampment Negotiators - There were two students who represented the Encampment in negotiations with the University. One of them was Mahmoud Khalil, and the other was [REDACTED].

3. University Senate delegation - a group of University Senators, some witnessing the negotiations as neutral observers, and others serving as neutral mediators to help both sides come to an agreement. We were asked to take on this role by the Encampment Negotiators, who wanted a trusted, neutral body to ensure that the University administration dealt with them in good faith. This format for the negotiations was agreed to by the University.
4. University Negotiators - members of the University administration who represented the University in the negotiations and reported to senior University leadership
5. University (or University Administration) - the senior University leadership who made the ultimate decisions when it came to the negotiations. This included the President of the Columbia, the Board of Trustees, and whoever else they decided to include in their decision-making process

During this time, I spent many hours, sometimes almost the entire day, in the negotiating room with Mahmoud and the others. Not a single negotiating session would pass without Mahmoud stating that he is not a member of CUAD and that he does not have the power to tell the Encampment what to do. This was not some negotiating tactic. When I was not in the negotiating room, I observed what happened in the Encampment and how they made decisions. The Encampment Negotiators, including Mahmoud, would come down and provide the latest update to a committee of members in the Encampment, which included some CUAD members. This committee would then discuss the updates and then share them with the entire Encampment during an "assembly" meeting. There were times when they just had Mahmoud and/or [REDACTED] share the updates directly at assembly. If there was a decision to be made (for example, to accept or decline a given deal), that would be voted on at assembly by everyone in the Encampment, which included both CUAD and non-CUAD members. There would be individuals who spoke up in favor of or against particular actions or decisions, meaning there was an opportunity to discuss or debate at assembly as well. The Encampment Negotiators would then take this decision back into the negotiating room during the next session to continue in trying to reach an agreement. So, in the entire process, Mahmoud was fully faithful in representing the demands of the Encampment in the negotiations, and held no position to make decisions. He was, in a sense, a messenger and an ambassador, and he would constantly ensure that everyone in the negotiating room understood the limitations of his influence in the process as a non-CUAD member, particularly because he respected the democratic decision-making of the Encampment.

This should be enough to explain that Mahmoud was not a member of CUAD, and was simply negotiating on behalf of the Encampment (which included CUAD and non-CUAD protestors); he would constantly repeat this fact, and all of his interactions with CUAD and the Encampment were aligned with this reality. But, I want to also back up a bit and share another interaction with Mahmoud that gives more context and evidence for him not being a member of CUAD.

My first real interaction with Mahmoud was in February 2024, when he and a handful of other Palestinian students at Columbia, across different schools, came to my apartment to meet with me and some other University Senators. The University administration had just announced an

[Interim University Policy for Safe Demonstrations](#), which the Senate Executive Committee had consulted on in an attempt to ensure that the admin did not repeat their past transgressions of limiting the free speech rights of protesting students. While the University Senate did not agree with this new policy (it was never voted on by the full University Senate), it was a fairer and less restrictive framework for managing demonstrations when compared to how the University was previously operating. Because of this, a few of us University Senators wanted to meet with CUAD leadership to explain the new policy, come to an agreement on abiding by it, and hopefully open an ongoing dialogue that would help inform further reforms to University policies. (It is important to note that CUAD does not have a formal leadership structure, though we did not know about how they operated when initiating the meeting). Instead of meeting with us, the CUAD members who we were in contact with suggested that we meet with a delegation of Palestinian students and hear directly from them about their personal experiences trying to advocate for their people. We believed that taking that meeting was important to ensure that our constituents were heard (Palestinians students and their allies were rarely ever afforded the common courtesy of being able to share their stories with University leadership), to inform our decision-making with the needs of some of our most vulnerable community members, to build trust, and to eventually get around to meeting with CUAD and opening that dialogue. The Palestinian students did not feel comfortable or safe meeting with us without masks on campus, and this was of course understandable given the persecution and doxxing that they and their allies had already faced thus far. So, I offered my apartment as a more neutral meeting space.

Mahmoud introduced himself to me and my colleagues as folks started trickling into the apartment, and I recognized him from other events around campus. I did not know he was Palestinian until then. I kicked off our meeting and Mahmoud acted as a sort of facilitator for their side. When introducing everyone, he made a few things clear: 1) they were not here representing CUAD, 2) some of them may be involved with CUAD in various capacities, but not all of them are, and 3) he was not affiliated with CUAD. As the meeting went on, it became clear to me that Mahmoud was a trusted member of the Palestinian student community, and it became clear why - he was empathetic, knowledgeable, wise, diplomatic, and steadfast. He did not need to be a member of CUAD or the leader of a student org to advocate for his people; he just needed to be who he is and stay engaged where he can make the most impact.

From that first interaction, I knew that Mahmoud was neither a leader nor a member of CUAD. But, because of that same first meeting, I knew that he would always do what he could, in his personal capacity, to support his community and stand up for what is right. So when, a few months later, I walked into a room where negotiations between the University and the Encampment were to take place, I was not surprised to see him sitting there, representing the protestors in the Encampment. They could not have asked a better person to speak on their behalf, and indeed, the University could not have asked for a better negotiating partner; not because he would agree to their unserious demands, but because Mahmoud was composed and honorable. He would (and did) deal with the University with equitability and honesty. It is a shame that [the rest of that chapter ended so disgracefully](#).

To sum up this letter for support, I, in my capacity as a student leader within the University Senate, met with and worked directly with Mahmoud Khalil to help better represent and meet the needs of the University student body and various other stakeholders. Through all of my interactions with Mahmoud in that capacity, it was clear to me that Mahmoud was not a member of CUAD. Any allegation to the contrary is baseless.

I hope you will consider these facts as you make this decision. Thank you.

Sincerely,

[REDACTED]

[REDACTED]

TAB L





**KEEP OUR COMMUNITY SAFE**

**ENSURE DOORS  
CLOSE AND LOCK  
BEHIND YOU**

**PREVENT  
UNAUTHORIZED  
ACCESS  
(PIGGYBACKING)**

**VERIFY  
VISITORS BEFORE  
GRANTING ENTRY**

**REPORT  
SUSPICIOUS  
ACTIVITY  
IMMEDIATELY**

**CONTACT PUBLIC SAFETY AT (212) 854-5555**

**COLUMBIA RESIDENTIAL**

**For Safety's Sake,  
Don't hold the door for  
anyone you don't know.**



COLUMBIA RESIDENTIAL  
CONTACT PUBLIC SAFETY AT (212) 854-5552

**For Safety's Sake,  
Don't hold the door for  
anyone you don't know.**

**This may seem impolite,  
but your fellow residents  
will understand.**

**This is a matter of Safety—  
Yours and Your Neighbors'.**





## EXHIBIT 2

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

Tab \_\_\_\_\_ Page \_\_\_\_\_

**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, 2025 ..... 1

*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, 2025 .....5**

*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 [REDACTED], and then as his supervisor in his role as a Teaching Assistant for the course [REDACTED]. 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, 2025 .....7

*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, [REDACTED] 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, 2025 .....9**

*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 [REDACTED], 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 conference .....10

*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 [REDACTED], Director, UNRWA Representative Office, dated April 22, 2025 .....11

*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 [REDACTED], and then as his supervisor in his role as a Teaching Assistant for the course [REDACTED]. 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 16<sup>th</sup>, 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 14<sup>th</sup>, 2025

*Lecturer at Columbia University's School of International and Public Affairs in the Master of Public Administration in Development Practice* [REDACTED]

[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, [REDACTED], 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,

[REDACTED]

[REDACTED]

President  
Society for International Development, United States Chapter



united nations relief and works agency  
for palestinian refugees in the near east  
وكالة الأمم المتحدة لإغاثة وتشغيل  
اللاجئين الفلسطينيين في الشرق الأدنى

representative office  
new york

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

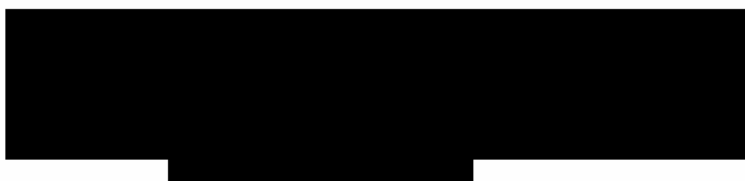
t: +1 212 963 2255

[www.unrwa.org](http://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.



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.

