EXHIBIT E

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Alice Miller
Chief Counsel
Numa Metoyer
Deputy Chief Counsel
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
830 Pinehill Road
Jena, Louisiana 71342
TEL: (318) 992-1850

☒ DETAINED

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

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

Immigration Judge: Comans

Next Hearing 4/11/2025

U.S. DEPARTMENT OF HOMELAND SECURITY'S

SUBMISSION OF DOCUMENTS

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

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A	Letter The Secretary of State Washington From: Marco Rubio Subject: Notification of Removability Determinations under Section 237(a)(4)(C) of the Immigration and Nationality Act (INA)

Respectfully submitted on April 9, 2025,

NUMA V METOYER III

Digitally signed by NUMA V METOYER III
Date: 2025.04.09 13:47:41 -05'00'

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

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CERTIFICATE OF SERVICE

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

☐ Central Louisiana ICE Processing Center
830 Pinehill Rd,
Jena, Louisiana 71342

☑ the Executive Office for Immigration Review (EOIR) Court & Appeals System (ECAS), in accordance with 8 C.F.R. 1003.31. The electronic case record in ECAS includes a Form EOIR-28 Notice of Entry of Appearance, which indicates the respondent is represented by counsel for this proceeding. Pursuant to 8 C.F.R. 1003.32, filing the foregoing via ECAS will effectuate service of the motion upon the respondent.

☐ River Correctional Center
26362 Highway 15
Ferriday, LA 71334

☐ OTHER:

NUMA V METOYER III Digitally signed by NUMA V METOYER III Date: 2025.04.09 13:48:24 -05'00'

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

4/9/25
Date

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TAB A

THE SECRETARY OF STATE
WASHINGTON

SENSITIVE BUT UNCLASSIFIED//LAW ENFORCEMENT SENSITIVE

MEMORANDUM FOR THE SECRETARY OF HOMELAND SECURITY

FROM: Marco Rubio

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

(SBU) I am writing to inform you that upon notification from the Department of Homeland Security's Homeland Security Investigations (DHS/ICE/HSI) on March 7, 2025, I have determined that [redacted] and Mahmoud Khalil (DOB: 01-JAN-1995; POB: Algeria), both U.S. Lawful Permanent Residents (LPRs), are deportable aliens under INA section 237(a)(4)(C). I understand that ICE now intends to initiate removal charges against them, based on assurances from DHS/ICE/HSI.

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

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

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

Attachments

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