EXHIBIT A

Democracy Dies in Darkness

Trump told donors he will crush pro-Palestinian protests, deport demonstrators

Trump has waffled on whether the Israel-Gaza war should end. But speaking to wealthy donors behind closed doors, he said that he supports Israel's right to continue "its war on terror."

May 27, 2024

By Josh Dawsey, Karen DeYoung and Marianne LeVine

Former president Donald Trump promised to crush pro-Palestinian protests on college campuses, telling a roomful of donors — a group that he joked included "98 percent of my Jewish friends" — that he would expel student demonstrators from the United States, according to participants in the roundtable event with him in New York.

"One thing I do is, any student that protests, I throw them out of the country. You know, there are a lot of foreign students. As soon as they hear that, they're going to behave," Trump said on May 14, according to donors at the event.

When one of the donors complained that many of the students and professors protesting on campuses could one day hold positions of power in the United States, Trump called the demonstrators part of a "radical revolution" that he vowed to defeat. He praised the New York Police Department for clearing the campus at Columbia University and said other cities needed to follow suit, saying "it has to be stopped now."

"Well, if you get me elected, and you should really be doing this, if you get me reelected, we're going to set that movement back 25 or 30 years," he said, according to the donors, who spoke on the condition of anonymity to detail a private event.

Trump has waffled publicly about whether Israel should continue its war in Gaza, saying "get it over with … get back to peace and stop killing people." Major Republican donors have lobbied him in recent months to take a stronger stance backing Israel and its prime minister, Benjamin Netanyahu.

The private New York meeting offers new insight into his current thinking. Speaking to wealthy donors behind closed doors, Trump said that he supports Israel's right to continue "its war on terror" and boasted of his White House policies toward Israel.

The former president didn't mention Netanyahu, whom he resents for acknowledging Joe Biden's victory in 2020 and hasn't spoken to in years.

Trump has offered few policy specifics about how he would treat Israel in a second term. He cast doubt on the viability of an independent Palestinian state in a recent Time magazine interview, saying he was "not sure a two-state solution anymore is gonna work," adding: "there may not be another idea." A two-state solution to the Israeli-Palestinian conflict has been the end goal of U.S. policy under Democratic and Republican presidents for decades.

Trump's campaign did not respond to detailed questions about The Washington Post's reporting. "When President Trump is back in the Oval Office, Israel will once again be protected, Iran will go back to being broke, terrorists will be hunted down, and the bloodshed will end," Karoline Leavitt, the campaign's national press secretary, wrote in an email.

Both Trump and Biden have struggled with the politics of the Israeli-Palestinian conflict on the campaign trail. Biden's base is deeply divided on the Israel-Gaza war, but Trump's rhetoric on the subject has limited his ability to capitalize on his opponent's problems.

Trump has repeatedly claimed in public statements and interviews that Hamas's Oct. 7 attack on Israel, which sparked the Gaza war, would have never happened if he were president.

But he has also criticized Israel's approach to the war, albeit in somewhat confusing terms. In a March interview with the Israeli newspaper Israel Hayom, Trump said, "You have to finish up your war. To finish it up. You gotta get it done." In April, he argued the war was bad for Israel's image, telling conservative talk show radio host Hugh Hewitt that Israel is "absolutely losing the PR war."

Trump took a different tone in the meeting with donors. Instead of saying it was time to wrap up the war, he said he supported Israel's right to continue its attack on Gaza.

"But I'm one of the only people that says that now. And a lot of people don't even know what October 7th is," Trump said.

Trump repeatedly listed for the donors everything he believed he had done for Israel in the White House. He moved the U.S. Embassy to Jerusalem, bucking decades of U.S. policy. He recognized the Golan Heights, which Israel seized from Syria in 1967, as an integral part of Israel after what he said was a five-minute conversation with David Friedman, his ambassador there.

He also polled the room if they liked Friedman.

"So I did Golan Heights. You know that's worth $2 trillion, they said, that piece, if you put it in real estate terms. But it's worth more than that. It is," Trump said, according to donors present.

Israel, Trump argued, needs his help. Street demonstrations for Israel get smaller crowds than his rallies, he said. In Washington, and particularly in Congress, "Israel is losing its power," he added. "It's incredible."

The former president repeatedly expressed frustration that Jewish Americans did not vote for him as much as he believes they should, the donors said.

"But how can a Jewish person vote for a Democrat, and Biden in particular — but forget Biden. They always let you down," he said, referring to Democrats.

Trump has made similar comments in public, occasionally triggering backlash. Some Jewish Americans have said that his rhetoric evokes the antisemitic idea that American Jews are more loyal to their religion or to Israel than to the United States.

Several influential Republican donors, including Miriam Adelson, have pressed Trump to publicly express support not only for Israel but also for Netanyahu, its embattled leader.

Trump never mentioned Netanyahu at the roundtable. But he has frequently complained about Netanyahu in public — particularly after the Israeli prime minister acknowledged Biden's victory in the 2020 election even as Trump was still fiercely challenging the results.

"Bibi Netanyahu rightfully has been criticized for what took place on October 7," Trump told Time, referring to the Israeli government's failure to prevent the surprise attack, in which Hamas militants killed about 1,200 Israelis and took 253 hostage. He also recalled that he had "a bad experience with Bibi," claiming that Israel had planned to participate in the 2020 U.S. strike that killed Iranian Gen. Qasem Soleimani but backed out at the last minute.

Trump's annoyance with Netanyahu dates to his time in the White House and his frustration that he felt he did not get enough credit for what he did for Israel and its leader when he was in office, John Bolton, Trump's former national security adviser, said in an interview.

"He doesn't like Netanyahu … it's because Bibi is one of the premier democratic politicians in the world in terms of getting publicity about himself and Trump resents that," said Bolton, a frequent Trump critic. "Trump fundamentally sees Netanyahu as getting credit for things Trump thinks he ought to get credit for."

Until the 2020 election, the two leaders had a close working relationship, according to one person familiar with their relationship, who spoke on the condition of anonymity to describe the leaders' private conversations. But Trump was "taken aback" by a video Netanyahu made congratulating Biden on his victory. Trump, this person said, thought the video was a "little too cordial."

Sen. Lindsey Graham (R-S.C.), a Trump ally and sometimes critic, didn't directly address Trump's comments about Israel when asked about them in an interview. But he offered a broad assessment.

"We can have our opinions about our allies but I think they're in the middle of a fight for their life, there'll be plenty of time for the accountability to be had," he said. "The best route to deliver that accountability will be the Israeli people."

Trump and Netanyahu's relationship will "continue to prosper and flourish" if they're both in office at the same time again, Matthew Brooks, chief executive of the Republican Jewish Coalition, said in an interview.

"He's giving the Israelis a blank check to go in and do what they need to do to destroy Hamas and eliminate the threat in Gaza from Hamas. And what he's also saying, which is actually true, he said 'but do it quickly' because time is not Israel's ally right now," Brooks said.

"President Biden stands against antisemitism and is committed to the safety of the Jewish community, and security of Israel. Donald Trump does not," James Singer, a spokesman for the Biden campaign, said in a statement earlier this month.

Top Trump allies recently visited Israel for meetings with Netanyahu and other officials in a delegation headed by Robert O'Brien, another of Trump's former White House national security advisers. The trip was organized by the pro-Israel American Israel Public Affairs Committee, and the group did not come bearing messages from Trump or speaking on behalf of the Trump administration, said Ed McMullen, who served as U.S. ambassador to Switzerland under the Trump administration.

The group watched gruesome footage of the Oct. 7 attack and toured parts of the country where Israelis had been killed or kidnapped, making for an "educational visit that was life-changing," McMullen said. The group is likely to debrief Trump on the trip at some point, he added.

At the donor roundtable, Trump said he had studied Jewish history and had thoughts about this moment in U.S. history.

"And you know, you go back through history, this is like just before the Holocaust. I swear. If you look, it's the same thing," Trump said. "You had a weak president or head of the country. And it just built and built. And then, all of a sudden, you ended up with Hitler. You ended up with a problem like nobody knew."

What readers are saying

The comments reflect a strong opposition to Donald Trump, with many expressing concerns about his potential re-election and the implications for democracy and civil rights. Several comments draw parallels between Trump and historical fascist leaders, emphasizing fears of... Show more

This summary is AI-generated. AI can make mistakes and this summary is not a replacement for reading the comments.

EXHIBIT B

Federal Register
Vol. 90, No. 19
Thursday, January 30, 2025

Presidential Documents

Title 3—

The President

Executive Order 14161 of January 20, 2025

Protecting the United States From Foreign Terrorists and Other National Security and Public Safety Threats

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the Immigration and Nationality Act (INA), 8 U.S.C. 1101 *et seq.,* and section 301 of title 3, United States Code, it is hereby ordered:

Section 1. *Policy and Purpose.* (a) It is the policy of the United States to protect its citizens from aliens who intend to commit terrorist attacks, threaten our national security, espouse hateful ideology, or otherwise exploit the immigration laws for malevolent purposes.

(b) To protect Americans, the United States must be vigilant during the visa-issuance process to ensure that those aliens approved for admission into the United States do not intend to harm Americans or our national interests. More importantly, the United States must identify them before their admission or entry into the United States. And the United States must ensure that admitted aliens and aliens otherwise already present in the United States do not bear hostile attitudes toward its citizens, culture, government, institutions, or founding principles, and do not advocate for, aid, or support designated foreign terrorists and other threats to our national security.

Sec. 2. *Enhanced Vetting and Screening Across Agencies.*

(a) The Secretary of State, in coordination with the Attorney General, the Secretary of Homeland Security, and the Director of National Intelligence, shall promptly:

(i) identify all resources that may be used to ensure that all aliens seeking admission to the United States, or who are already in the United States, are vetted and screened to the maximum degree possible;

(ii) determine the information needed from any country to adjudicate any visa, admission, or other benefit under the INA for one of its nationals, and to ascertain whether the individual seeking the benefit is who the individual claims to be and that the individual is not a security or public-safety threat;

(iii) re-establish a uniform baseline for screening and vetting standards and procedures, consistent with the uniform baseline that existed on January 19, 2021, that will be used for any alien seeking a visa or immigration benefit of any kind; and

(iv) vet and screen to the maximum degree possible all aliens who intend to be admitted, enter, or are already inside the United States, particularly those aliens coming from regions or nations with identified security risks.

(b) Within 60 days of the date of this order, the Secretary of State, the Attorney General, the Secretary of Homeland Security, and the Director of National Intelligence shall jointly submit to the President, through the Assistant to the President for Homeland Security, a report:

(i) identifying countries throughout the world for which vetting and screening information is so deficient as to warrant a partial or full suspension on the admission of nationals from those countries pursuant to section 212(f) of the INA (8 U.S.C. 1182(f)); and

(ii) identifying how many nationals from those countries have entered or have been admitted into the United States on or since January 20,

2021, and any other information the Secretaries and Attorney General deem relevant to the actions or activities of such nationals since their admission or entry to the United States.

(c) Whenever information is identified that would support the exclusion or removal of any alien described in subsection 2(b), the Secretary of Homeland Security shall take immediate steps to exclude or remove that alien unless she determines that doing so would inhibit a significant pending investigation or prosecution of the alien for a serious criminal offense or would be contrary to the national security interests of the United States.

Sec. 3. *Additional Measures to Protect the Nation.* As soon as possible, but no later than 30 days from the date of this order, the Secretary of State, in coordination with the Attorney General, the Secretary of Homeland Security, and the Director of National Intelligence, shall also:

(a) Evaluate and adjust all existing regulations, policies, procedures, and provisions of the Foreign Service Manual, or guidance of any kind pertaining to each of the grounds of inadmissibility listed in sections 212(a)(2)–(3) of the INA (8 U.S.C. 1182(a)(2)–(3)), to ensure the continued safety and security of the American people and our constitutional republic;

(b) Ensure that sufficient safeguards are in place to prevent any refugee or stateless individual from being admitted to the United States without undergoing stringent identification verification beyond that required of any other alien seeking admission or entry to the United States;

(c) Evaluate all visa programs to ensure that they are not used by foreign nation-states or other hostile actors to harm the security, economic, political, cultural, or other national interests of the United States;

(d) Recommend any actions necessary to protect the American people from the actions of foreign nationals who have undermined or seek to undermine the fundamental constitutional rights of the American people, including, but not limited to, our Citizens' rights to freedom of speech and the free exercise of religion protected by the First Amendment, who preach or call for sectarian violence, the overthrow or replacement of the culture on which our constitutional Republic stands, or who provide aid, advocacy, or support for foreign terrorists;

(e) Ensure the devotion of adequate resources to identify and take appropriate action for offenses described in 8 U.S.C. 1451;

(f) Evaluate the adequacy of programs designed to ensure the proper assimilation of lawful immigrants into the United States, and recommend any additional measures to be taken that promote a unified American identity and attachment to the Constitution, laws, and founding principles of the United States; and

(g) Recommend any additional actions to protect the American people and our constitutional republic from foreign threats.

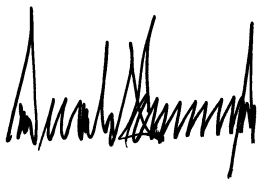
Sec. 4. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.



THE WHITE HOUSE,
January 20 2025.

[FR Doc. 2025–02009
Filed 1–29–25; 8:45 am]
Billing code 3395–F4–P

EXHIBIT C

Federal Register
Vol. 90, No. 21
Monday, February 3, 2025

Presidential Documents

Title 3—

The President

Executive Order 14188 of January 29, 2025

Additional Measures To Combat Anti-Semitism

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered:

Section 1. *Purpose.* My Administration has fought and will continue to fight anti-Semitism in the United States and around the world. On December 11, 2019, I issued Executive Order 13899, my first Executive Order on Combating Anti-Semitism, finding that students, in particular, faced anti-Semitic harassment in schools and on university and college campuses. Executive Order 13899 provided interpretive assistance on the enforcement of the Nation's civil rights laws to ensure that they would protect American Jews to the same extent to which all other American citizens are protected. The prior administration effectively nullified Executive Order 13899 by failing to give the terms of the order full force and effect throughout the Government. This order reaffirms Executive Order 13899 and directs additional measures to advance the policy thereof in the wake of the Hamas terrorist attacks of October 7, 2023, against the people of Israel. These attacks unleashed an unprecedented wave of vile anti-Semitic discrimination, vandalism, and violence against our citizens, especially in our schools and on our campuses. Jewish students have faced an unrelenting barrage of discrimination; denial of access to campus common areas and facilities, including libraries and classrooms; and intimidation, harassment, and physical threats and assault. A joint report by the House Committees on Education and the Workforce, Energy and Commerce, Judiciary, Oversight and Accountability, Veterans' Affairs, and Ways and Means calls the Federal Government's failure to fight anti-Semitism and protect Jewish students ''astounding.'' This failure is unacceptable and ends today.

Sec. 2. *Policy.* It shall be the policy of the United States to combat anti-Semitism vigorously, using all available and appropriate legal tools, to prosecute, remove, or otherwise hold to account the perpetrators of unlawful anti-Semitic harassment and violence.

Sec. 3. *Additional Measures to Combat Campus Anti-Semitism.* (a) Within 60 days of the date of this order, the head of each executive department or agency (agency) shall submit a report to the President, through the Assistant to the President for Domestic Policy, identifying all civil and criminal authorities or actions within the jurisdiction of that agency, beyond those already implemented under Executive Order 13899, that might be used to curb or combat anti-Semitism, and containing an inventory and analysis of all pending administrative complaints, as of the date of the report, against or involving institutions of higher education alleging civil-rights violations related to or arising from post-October 7, 2023, campus anti-Semitism.

(b) The report submitted by the Attorney General under this section shall additionally include an inventory and an analysis of all court cases, as of the date of the report, against or involving institutions of higher education alleging civil-rights violations related to or arising from post-October 7, 2023, campus anti-Semitism and indicate whether the Attorney General intends to or has taken any action with respect to such matters, including filing statements of interest or intervention.

(c) The Attorney General is encouraged to employ appropriate civil-rights enforcement authorities, such as 18 U.S.C. 241, to combat anti-Semitism.

(d) The report submitted by the Secretary of Education under this section shall additionally include an inventory and an analysis of all Title VI complaints and administrative actions, including in K–12 education, related to anti-Semitism—pending or resolved after October 7, 2023—within the Department's Office for Civil Rights.

(e) In addition to identifying relevant authorities to curb or combat anti-Semitism generally required by this section, the Secretary of State, the Secretary of Education, and the Secretary of Homeland Security, in consultation with each other, shall include in their reports recommendations for familiarizing institutions of higher education with the grounds for inadmissibility under 8 U.S.C. 1182(a)(3) so that such institutions may monitor for and report activities by alien students and staff relevant to those grounds and for ensuring that such reports about aliens lead, as appropriate and consistent with applicable law, to investigations and, if warranted, actions to remove such aliens.

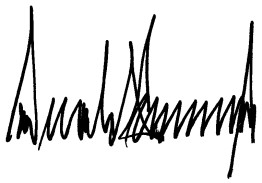
Sec. 4. *General Provisions.* (a) Nothing in this order shall be construed to impair or otherwise affect

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.



THE WHITE HOUSE,
January 29, 2025.

[FR Doc. 2025–02230
Filed 1–31–25; 11:15 am]
Billing code 3395–F4–P

EXHIBIT D

The WHITE HOUSE

FACT SHEETS

Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism

The White House

January 30, 2025

COMBATING ANTI-SEMITISM IN THE UNITED STATES: Today, President Donald J. Trump signed an Executive Order to Combat Anti-Semitism.

- Expanding on his Executive Order 13899, President Trump's new Order takes forceful and unprecedented steps to marshal all Federal resources to combat the explosion of anti-Semitism on our campuses and in our streets since October 7, 2023.
- Every Federal executive department and agency leader will review and report to the White House within sixty days on *all* criminal and civil authorities and actions available for fighting anti-Semitism.
- Immediate action will be taken by the Department of Justice to protect law and order, quell pro-Hamas vandalism and intimidation, and investigate and punish anti-Jewish racism in leftist, anti-American colleges and universities.
- The Order demands the removal of resident aliens who violate our laws.

GOING ON OFFENSE TO ENFORCE LAW AND ORDER AND TO PROTECT CIVIL RIGHTS: Immediately after the jihadist terrorist attacks against the people of Israel on October 7, 2023, pro-Hamas aliens and left-wing radicals began a campaign of intimidation, vandalism, and violence on the campuses and streets of America.

- Celebrating Hamas' mass rape, kidnapping, and murder, they physically blocked Jewish Americans from attending college classes, obstructed synagogues and assaulted worshippers, and vandalized American monuments and statues.
- The Biden Administration turned a blind eye to this coordinated assault on public order; it simply refused to protect the civil rights of Jewish Americans, especially

students. According to a December 2024 U.S. House of Representatives Staff Report on anti-Semitism, "the failure of our federal government departments and agencies is astounding."

PRESIDENT TRUMP KEEPS HIS PROMISES AND BUILDS ON HIS SUCCESS: In his first term, President Trump kept his biggest promises:

- He moved the American Embassy in Israel to Jerusalem: After decades of broken promises and despite much criticism, President Trump was the President who finally kept his commitment to Israel to move the American embassy from Tel-Aviv to Israel's true and rightful capital: Jerusalem.
- He established the Abraham Accords: President Trump delivered the greatest breakthrough for peace in the Middle East in decades by brokering the normalization of ties between Israel and the United Arab Emirates, Bahrain, Sudan, and Morocco, protecting Israel and Jews and spreading security and prosperity to the entire region.

Now, President Trump has promised that the Federal Government will:

- Protect the civil rights of our Jewish citizens: "My promise to Jewish Americans is this: With your vote, I will be your defender, your protector, and I will be the best friend Jewish Americans have ever had in the White House."
- Aggressively enforce the law, protect public order, and prosecute anti-Semitic crimes: "I will issue clear orders to my Attorney General to aggressively prosecute terroristic threats, arson, vandalism and violence against American Jews."
- Deport Hamas Sympathizers and Revoke Student Visas: "To all the resident aliens who joined in the pro-jihadist protests, we put you on notice: come 2025, we will find you, and we will deport you. I will also quickly cancel the student visas of all Hamas sympathizers on college campuses, which have been infested with radicalism like never before."

ADMINISTRATION

ISSUES

CONTACT

VISIT

GALLERY

EOP



THE WHITE HOUSE

1600 Pennsylvania Ave NW
Washington, DC 20500

WH.GOV

EXHIBIT E



Secretary Marco Rubio

@SecRubio

Those who support designated terrorist organizations, including Hamas, threaten our national security. The United States has zero tolerance for foreign visitors who support terrorists. Violators of U.S. law — including international students — face visa denial or revocation, and deportation.

5:30 PM · Mar 6, 2025 · **3.9M** Views

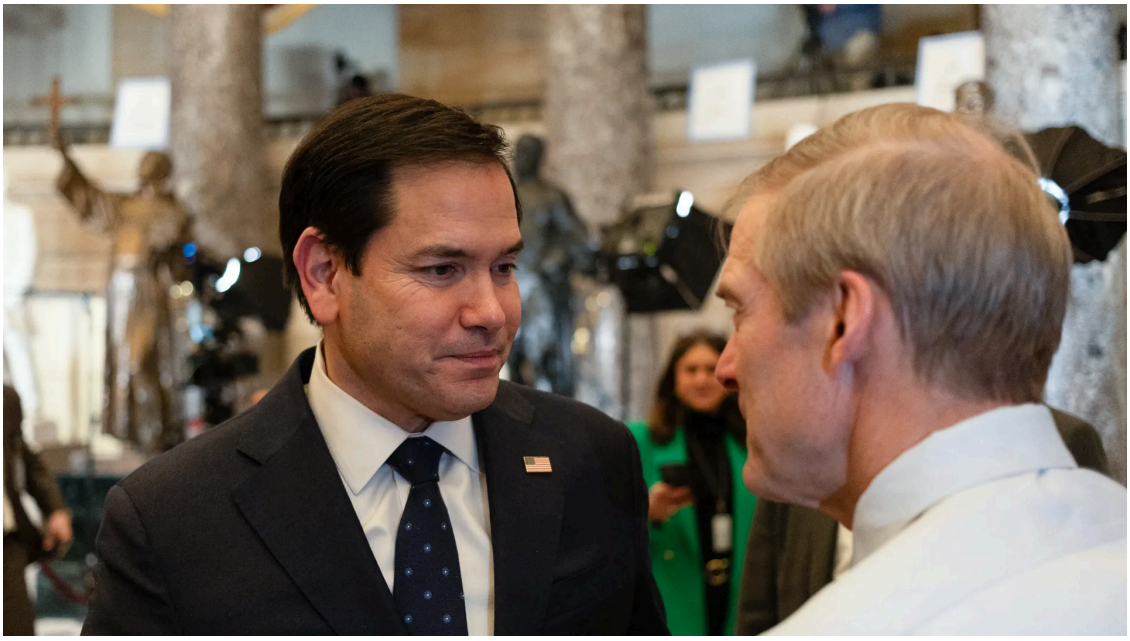
11K 18K 84K 1.5K

EXHIBIT F

Mar 6, 2025 - Politics & Policy

Scoop: State Dept. to use AI to revoke visas of foreign students who appear "pro-Hamas"

Marc Caputo



Secretary of State Marco Rubio speaks with Rep. Jim Jordan (R-Ohio) in Statuary Hall before President Trump's address to Congress on Tuesday. Photo: Alex Wroblewski/AFP via Getty Images

Secretary of State Marco Rubio is launching an AI-fueled "Catch and Revoke" effort to cancel the visas of foreign nationals who appear to support Hamas or other designated terror groups, senior State Department officials tell Axios.

Why it matters: The effort — which includes AI-assisted reviews of tens of thousands of student visa holders' social media accounts — marks a dramatic escalation in the U.S. government's policing of foreign nationals' conduct and speech.

- The reviews of social media accounts are particularly looking for evidence of alleged terrorist sympathies expressed after Hamas' Oct. 7, 2023, attack on Israel, officials say.

Officials plan to examine internal databases to see whether any visa holders were arrested but allowed to stay in the country during the Biden administration.

- They say they're also checking news reports of anti-Israel demonstrations and Jewish students' lawsuits that highlight foreign nationals allegedly engaged in antisemitic activity without consequence.

- The State Department is working with the departments of Justice and Homeland Security in what one senior State official called a "whole of government and whole of authority approach."

Zoom in: To launch "Catch and Revoke," federal officials examined 100,000 people in the Student Exchange Visitor System since October 2023 to see if any visas had been revoked because the student been arrested or suspended from school.

- Usually, a consular official whose office issues the visa for a foreigner makes the revocation decision once they've been alerted about an arrest or a suspension.

- "We found literally zero visa revocations during the Biden administration," the official said, "... which suggests a blind eye attitude toward law enforcement."

Zoom out: The Immigration Nationality Act of 1952 gives the secretary of state the authority to revoke visas from foreigners deemed to be a threat —a point Rubio made as a senator eight days after Oct. 7.

- "We see people marching at our universities and in the streets of our country ... calling for Intifada, celebrating what Hamas has done ... Those people need to go," Rubio said.

- Trump echoed the same sentiments in a Jan. 30 White House fact sheet tied to an executive order aimed at antisemitism at "pro-Hamas" activity: "To all the resident aliens who joined in the pro-jihadist protests, we put you on notice. We will find you, and we will deport you."

- Another executive order, issued Jan. 20, targets visa holders and foreigners who "threaten our national security, espouse hateful ideology."

The big picture: The cumulative effect of Trump's executive orders is already having a chilling effect on student visa-holders. They're starting to shy away from protests critical of Israel.

- "This should concern all Americans. This is a First Amendment and freedom of speech issue and the administration will overplay its hand," said Abed Ayoub, head of the American-Arab Anti-Discrimination Committee.

- "Americans won't like this. They'll view this as capitulating free speech rights for a foreign nation."

The backstory: Ayoub said "the blueprint" for the new program can be found in Operation Boulder of 1972, when the Nixon administration infiltrated and surveilled pro-Palestinian groups, which he said infringed on the rights of U.S. citizens as well as foreign nationals.

- "With the advent of AI, it's even scarier because they're policing speech and using faulty technology," Ayoub said.

The senior State Department official, however, said that "it would be negligent for the department that takes national security seriously to ignore publicly available information about [visa] applicants in terms of AI tools. ... AI is one of the resources available to the government that's very different from where we were technologically decades ago."

- If officials find a social media post from a foreign national that appears to endorse the attack on Israel and looks "pro-Hamas," the official said, that could be grounds for visa revocation.

- "Under President Trump, the Immigration Nationality Act is great again," the official added.

Between the lines: The Trump administration's pro-Israel posture reflects his and Rubio's longstanding commitment toward the Jewish state, an issue of intense interest to white evangelicals.

- Opposition to Israel's bombing campaign in Gaza, meanwhile, has divided the Democratic base, polls show.

Voters tend to disfavor rallies critical of Israel, and in some surveys a plurality of voters doesn't distinguish between support for Hamas and support for the Palestinian people — despite the efforts of some organizers.

- "We're not doing this for the polling, but it never hurts to be on the right side of an issue," a White House adviser said.

Want more stories like this? Sign up for Axios AM

Enter your email address

Subscribe

Go deeper

Marc Caputo
Mar 27, 2025 - Politics & Policy

Exclusive: Trump's "pro-Hamas" purge could block foreign students from colleges



Illustration: Brendan Lynch/Axios

The Trump administration is discussing plans to try to block certain colleges from having any foreign students if it decides too many are "pro-Hamas," senior Justice and State Department officials tell Axios.

Why it matters: The effort — which could include grand jury subpoenas —marks another escalation of Trump's aggressive crackdown on immigration and antisemitism that civil libertarians say stifles campus speech and has led to several lawsuits.

Go deeper (3 min. read) ⟶



Avery Lotz
Mar 27, 2025 - Politics & Policy

Rubio says U.S. may have pulled more than 300 visas



Secretary of State Marco Rubio listens to a question during a press conference with Guyanese President Irfaan Ali (not pictured) in Georgetown, Guyana, on March 27. Photo: Nathan Howard/POOL/AFP via Getty Images

Secretary of State Marco Rubio said Thursday that the State Department may have already revoked more than 300 visas as the Trump administration pushes a sweeping immigration crackdown.

The big picture: Federal immigration enforcement has turned to college campuses, where it is targeting those who have expressed pro-Palestinian views in a strategy First Amendment and immigration advocates say is stifling free speech.

Go deeper (1 min. read) →



Russell Contreras, Steph Solis
23 hours ago - Politics & Policy

Ambush arrest of Tufts student sparks new concerns about immigration crackdown



Signage and flowers are placed on a tree next to where ICE agents apprehended Tuft University graduate student Rumeysa Ozturk on March 27, 2025 in Somerville, Massachusetts. Photo: Scott Eisen/Getty Images

The arrest of a Tufts University student by hooded Homeland Security agents in plain clothes — caught on video on a suburban Boston street — is raising fresh questions about the Trump administration's aggressive crackdown on immigrants over the opinions they've expressed.

Why it matters: The administration's push to quickly scoop up, detain and deport college students with pro-Palestinian views has stunned civil libertarians, who say it violates American traditions of free speech and due process under the law.

Go deeper (2 min. read) →

Smarter, faster on what matters.

Explore Axios Newsletters

About Axios
Advertise with us
Careers
Contact us
Newsletters
Axios Live
Axios Entertainment
Axios HQ
Privacy policy
Terms of use
Your Privacy Choices

Copyright Axios Media, 2024

EXHIBIT G

EXHIBIT A

Uploaded on: 03/09/2025 at 10:37:47 AM (Central Daylight Time) Case 2:25-cv-01963-MEMF-MAR Document 1-4 Filed 03/20/25 Page 2 of 6 Page ID: 125

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [redacted]

Event No: [redacted]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [redacted] FINS: [redacted] File No: [redacted]

In the Matter of:

Respondent: MAHMOUD KHALIL currently residing at:

[redacted]

(Number, street, city, state and ZIP code) (Area code and phone number)

☐ You are an arriving alien.

☐ You are an alien present in the United States who has not been admitted or paroled.

☒ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;

2. You are a native of SYRIA and a citizen of ALGERIA;

3. You were admitted to the United States at unknown place on or about unknown date as a unknown manner;ORYour status was adjusted to that of a lawful permanent resident on November 2024 under section 212 (a)(3)(C) of the Act;

4. The Secretary of State has determined that your presence or activities in the United States would have serious adverse foreign policy consequences for the United States.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(4)(C)(i) of the Immigration and Nationality Act, as amended, in that the Secretary of State has reasonable ground to believe that your presence or activities in the United States would have potentially serious adverse foreign policy consequences for the United States.

☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

830 PINEHILL RD JENA LA 71342. LASALLE DETENTION FACILITY
(Complete Address of Immigration Court, including Room Number, if any)

on March 27, 2025 *(Date)* at 8:30 AM *(Time)* to show why you should not be removed from the United States based on the charge(s) set forth above.

TIMOTHY MORAN - Supervisory Special Agent TIMOTHY M MORAN JR Digitally signed by TIMOTHY M MORAN JR Date: 2025.03.09 00:41:11 -05'00'
(Signature and Title of Issuing Officer)

Date: March 9, 2025

26 Federal Plaza, New York, NY
(City and State)

EOIR – 1 of 3

Uploaded on: 03/09/2025 at 10:37:47 AM (Central Daylight Time) Page Filed: 1 of 3

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at http://www.ice.gov/contact/ero, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before: _____

_____ *(Signature of Respondent)*

_____ Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on March 9, 2025, in the following manner and in compliance with section 239(a)(1) of the Act.

☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail

☐ Attached is a credible fear worksheet.

☐ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the _____ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

(X) Refused to sign (G)

(Signature of Respondent if Personally Served)

TIMOTHY M MORAN JR Digitally signed by TIMOTHY M MORAN JR Date: 2025.03.09 09:41:28 -05'00'

TIMOTHY MORAN - Supervisory Special Agent

(Signature and Title of officer)

EOIR – 2 of 3

Uploaded on: 03/03/2025 at 10:37:47 AM (Central Daylight Time) Case 2:25-cv-01163-MWF-MAR Document 1-4 Filed 03/03/25 Page 4 of 6 Page ID: 127

Privacy Act Statement

Authority:
The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:
You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:
For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at https://www.dhs.gov/system-records-notices-sorns. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at https://www.justice.gov/opcl/doj-systems-records. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:
Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

EOIR – 3 of 3

Uploaded on: 3/17/2025 at 05:22:10 PM (Central Daylight Time) Base City: JENA
Case 2:25-cv-01963-MEMF-MAR Document 10-10 Filed 03/20/25 Page 5 of 6 Page ID: 128

U.S. Department of Homeland Security
Immigration and Customs Enforcement

Additional Charges of Inadmissibility / Deportability

In: **[x] Removal proceedings under section 240 of the Immigration and Nationality Act**

[ ] Deportation proceedings commenced prior to April 1, 1997, under former section 242 of the Immigration and Nationality Act

In the Matter of:
Alien/Respondent: Mahmoud Khalil

File No: _____ Address: 830 Pinehill Road, Jena, Louisiana 71342

[ ] - 1. You are an arriving alien.
[ ] 2. You are an alien present in the United States who has not been admitted or paroled.
[X] 3. You have been admitted to the United States, but are removable for the reasons stated below.

There is/are hereby lodged against you the following allegation(s), [ ] in addition to or [X] in lieu of, those set forth in the original charging document:

1. You are not a citizen or national of the United States;
2. You are a native of Syria and a citizen of Algeria;
3. You were admitted to the United States at John F. Kennedy International Airport, Queens, New York, on or about December 20, 2022, as an F-1 nonimmigrant student to attend Columbia University in New York, New York;
4. Your status was adjusted to that of a conditional lawful permanent resident on November 16, 2024, based on marriage to a U.S. Citizen spouse, under section 245(a) of the Immigration and Nationality Act;
5. The Secretary of State has determined that your activities and presence in the United States would have potentially serious adverse foreign policy consequences and would compromise a compelling U.S. foreign policy interest;
6. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question at part 8, page 9, you failed to disclose that you were a member of the United Nations Relief and Works Agency for Palestine Refugees (UNRWA) from June through November 2023, as a political affairs officer;
7. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question at part 3, page 6, you failed to disclose your continuing employment as a Program Manager by the Syria Office in the British Embassy in Beirut beyond 2022.
8. On your Form I-485, Application to Register Permanent Residence or Adjust Status, signed on March 26, 2024 and mailed on March 29, 2024, in response to the question part 8, page 9, you failed to disclose that you were a member of the Columbia University Apartheid Divest (CUAD).

There is/are hereby lodged against you the following charge(s), [X] in addition to or [ ] in lieu of, those set forth in the original charging document:

Section 237(a)(1)(A) of the Immigration and Nationality Act, as amended, in that at the time of entry or of adjustment of status, you were within one or more of the classes of aliens inadmissible by the law existing at such time, to wit: aliens who seek to procure, or have sought to procure, or who have procured a visa, other documentation, or admission into the United States, or other benefit provided under the Act, by fraud or by willfully misrepresenting a material fact, under Section 212(a)(6)(C)(i) of the Act.

3/17/2025
Dated:

(Signature of Deportation Officer)

EOIR – 1 of 2

FORM I-261

Uploaded on: 03/13/2025 at 05:02:10 PM (Central Daylight Time) Base City: LAWD
Case 2:25-cv-01063-JDC-TPL Document 1-4 Filed 03/20/25 Page 6 of 7 PageID: 129

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this Notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing, you will be given the opportunity to admit or deny any or all of the allegations in the charging document and that you are inadmissible or deportable on the charges contained in the charging document. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

Failure to appear: You are required to provide the INS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change you address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the INS.

Certificate of Service

This charging document was served on the respondent on 3/17/25, in the following manner in compliance with section 239(a)(1)(F) of the Act.

☒ in person ☐ by certified mail, return receipt requested ☐ by regular mail

to: 830 Pinehill Rd Jena LA 71342
(Alien's address)

~~☐~~ The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in Section 240(b)(7) of the Act.

Refuse to Sign
(Signature of respondent if personally served)

DO
(Signature and title of officer)

EXHIBIT H

Homeland Security
@DHSgov

On March 9, 2025, in support of President Trump's executive orders prohibiting anti-Semitism, and in coordination with the Department of State, U.S. Immigration and Customs Enforcement arrested Mahmoud Khalil, a former Columbia University graduate student. Khalil led activities aligned to Hamas, a designated terrorist organization.

ICE and the Department of State are committed to enforcing President Trump's executive orders and to protecting U.S. national security.

9:29 PM · Mar 9, 2025 · **3.7M** Views

3K 3.1K 18K 1.1K

EXHIBIT I

Marco Rubio
@marcorubio

We will be revoking the visas and/or green cards of Hamas supporters in America so they can be deported

apnews.com/article/columb...



From apnews.com

6:10 PM · Mar 9, 2025 · **19.4M** Views

16K 23K 136K 3.7K

EXHIBIT J



Donald J. Trump

@realDonaldTrump

Following my previously signed Executive Orders, ICE proudly apprehended and detained Mahmoud Khalil, a Radical Foreign Pro-Hamas Student on the campus of Columbia University. This is the first arrest of many to come. We know there are more students at Columbia and other Universities across the Country who have engaged in pro-terrorist, anti-Semitic, anti-American activity, and the Trump Administration will not tolerate it. Many are not students, they are paid agitators. We will find, apprehend, and deport these terrorist sympathizers from our country — never to return again. If you support terrorism, including the slaughtering of innocent men, women, and children, your presence is contrary to our national and foreign policy interests, and you are not welcome here. We expect every one of America's Colleges and Universities to comply. Thank you!

11.3k ReTruths **50k** Likes Mar 10, 2025, 1:05 PM

EXHIBIT K

THE FREEPRESS EXTRA! Get tickets to our next live debate in SF! NEWSLETTERS SIGN IN

The ICE Detention of a Columbia Student Is Just the Beginning



MAHMOUD KHALIL, SECOND FROM LEFT, AT A PROTEST AT COLUMBIA UNIVERSITY ON OCTOBER 12, 2023. (YUKI IWAMURA VIA AP PHOTO)

A White House official says that Mahmoud Khalil posed a 'threat to the foreign policy and national security interests of the United States.' And that his case is a blueprint for more arrests.

By Gabe Kaminsky, Madeleine Rowley, and Maya Sulkin

03.10.25 — U.S. Politics

805 376

UPGRADE TO LISTEN 5 MINS

On Saturday evening, federal immigration authorities arrested an anti-Israel activist who helped lead protests against the Jewish state on Columbia University's campus after Hamas's October 7, 2023 attack. As progressive activists and free speech advocates protested the move to revoke Mahmoud Khalil's green card over civil liberties concerns Monday, President Donald Trump warned that Khalil's arrest would be the first "of many to come."

Indeed, a White House official told *The Free Press* that the basis for targeting Khalil is being used as a blueprint for investigations against other students.

Khalil is a "threat to the foreign policy and national security interests of the United States," said the official, noting that this calculation was the driving force behind the arrest. "The allegation here is not that he was breaking the law," said the official.

"He was mobilizing support for Hamas and spreading antisemitism in a way that is contrary to the foreign policy of the U.S.," said the official, noting the Trump administration reviewed intelligence that found Khalil was a national security risk.

The official suggested more arrests at other schools were coming. “I suspect we’ll have other schools roped into this,” said the official.

Perhaps. But first, the Trump administration needs to contend with a federal judge in the Southern District of New York who, on Monday afternoon, blocked the deportation of Khalil, who is being held at an ICE detention facility in Louisiana. He is expected to appear in court Wednesday morning. The deportation of a lawful permanent resident such as Khalil generally requires the approval of an immigration judge.

Khalil’s case has thrown into dramatic relief debates over the limits of protected speech and what constitutes a legitimate response to the explosion of antisemitism on campuses across America since October 2023.

Born in Syria, Khalil is a permanent U.S. resident and has been in the country since 2023. Until December, he was a graduate student at Columbia, where he “led activities aligned to Hamas, a designated terrorist organization,” according to the Department of Homeland Security. His arrest comes as the Trump administration, per an executive order from the president in his first days in office, works to punish those who allegedly engaged in “antisemitic harassment and violence” following Hamas’s attack.

The move to revoke Khalil’s green card—and the basis for the decision—has prompted sharp criticism from pro–free speech groups across the political spectrum, all of whom warn that a crackdown on student protesters threatens their First Amendment rights.

“We’ve got an administration that is taking action against antisemitism and has not always drawn a clean line between protected political speech that may well be antisemitic, and unlawful discriminatory harassment,” Will Creeley, the legal director of the Foundation for Individual Rights and Expression, told *The Free Press*. FIRE sent a letter to the administration Monday demanding answers on Khalil’s arrest. The letter, addressed to Secretary of State Marco Rubio, Department of Homeland Security Secretary Kristi Noem, Attorney General Pam Bondi, and other agency heads, requested “the specific legal and factual basis for Mr. Khalil’s detention.”

Creeley added, “The lack of clarity results in a chill on protected political expression. We’ve got concerns here.”

“It’s disturbing,” David Keating, president of the right-leaning Institute for Free Speech, told *The Free Press*.

Lanae Erickson, senior vice president for social policy, education, and politics for the left-leaning think tank Third Way, said it’s important to keep in mind that lawful permanent residents—like Khalil—have rights that are protected by the U.S. Constitution. “What they’re trying to do is make people afraid,” argued Erickson.

But students who have faced antisemitic hostility on campus since October 7, 2023, see things differently. Shoshana Aufzien, a Barnard freshman, says Khalil’s deportation is completely reasonable. Aufzien, who is Jewish, says she hasn’t been able to attend many of her classes “because protesters physically impeded us from doing so or because professors have jumped on the bandwagon.”

“I don’t think anybody who is fomenting pro-terror, antisemitic, anti-American rhetoric, who isn’t a US citizen, has any inherent right to be here,” said Aufzien.

In a statement on Monday, Trump reiterated that “pro-terrorist, anti-Semitic, anti-American activity” will not be tolerated, noting that many protesters on campuses are “paid agitators.” (The Department of Homeland Security and the White House declined to comment on further actions at any other schools or how many arrests may be made in the coming weeks.)

This weekend, Secretary of State Marco Rubio posted that the State Department would be revoking the student visas and green cards of Hamas supporters. But exactly how this policy will be carried out remains unclear. *Axios* reported that the government will use AI for its new "Catch and Revoke" program to scan the social media accounts of students who are studying in the U.S. on visas to help identify those who support Hamas and other terrorist organizations.

Mark Goldfeder, head of the National Jewish Advocacy Center and a constitutional law expert, told *The Free Press* that there are several strong legal arguments for the revoking of visas.

For starters, *Turner v. Williams*, a Supreme Court case from 1904, set the precedent that aliens can be deported if they are engaging in specific dangerous activities or if they have certain dangerous views that those "who hold and advocate them would be undesirable additions to our population."

"The Supreme Court has been clear that the First Amendment might apply with some conditions to foreigners, and there [are] over 120 years of Supreme Court precedent saying that this is literally one of those conditions," Goldfeder said.

Under the Immigration and Nationality Act, passed in 1952, a visa holder who "endorses or espouses terrorist activity or persuades others to endorse or espouse terrorist activity or support[s] a terrorist organization" can be deported. This statute, Goldfeder says, could survive what's called "strict scrutiny" under the First Amendment.

"The statute would have to protect a compelling governmental interest and be narrowly tailored to protect that interest," said Goldfeder. "Because free speech is so incredibly important, in order to survive strict scrutiny, there would have to be an additional constitutional imperative weighing on the other side. What would that be? National security."

The arrest of the anti-Israel activist comes as Columbia is being investigated by the Department of Education for antisemitism. Last week, as *The Free Press* first reported, agencies cut off $400 million in federal funding to the university, claiming it has failed to take steps to confront antisemitism. The Trump administration has not said which programs are affected, and Columbia has vowed to "work with the federal government to restore Columbia's federal funding."

"We take Columbia's legal obligations seriously and understand how serious this announcement is and are committed to combating antisemitism and ensuring the safety and well-being of our students, faculty, and staff," said a spokesperson for the university—which saw several students face arrest last week for storming a building at Barnard College in protest against Israel.

Become a Paid Subscriber

Get access to our comments section, special columns like TGIF and Things Worth Remembering, tickets in advance to our live events, and more.

ENTER YOUR EMAIL

SIGN UP

ALREADY A PAID SUBSCRIBER? SWITCH ACCOUNTS

Gabe Kaminsky

Gabe Kaminsky is an investigative reporter for *The Free Press*.

Madeleine Rowley

Madeleine Rowley is an investigative reporter covering immigration, financial corruption, and politics. She is a 2023-2024 Manhattan Institute Logos Fellow with previous bylines in *The Free Press*, *City Journal*, and *Public*. As a U.S. Army spouse for almost a decade, she's lived in six states and spent two years in Jerusalem, Israel. She currently resides on the Ea...

Maya Sulkin

Maya Sulkin is a reporter and assistant editor. Before that, Maya was chief of staff at *The Free Press*. She started as an intern in 2021 while a student at Columbia University.

TAGS: COLUMBIA ANTISEMITISM DONALD TRUMP BIG TECH AND FREE SPEECH ICE CAMPUS WARS

MAKE A COMMENT LIKE ARTICLE SHARE ARTICLE

Comments

Join the conversation

EXHIBIT L

Factbase

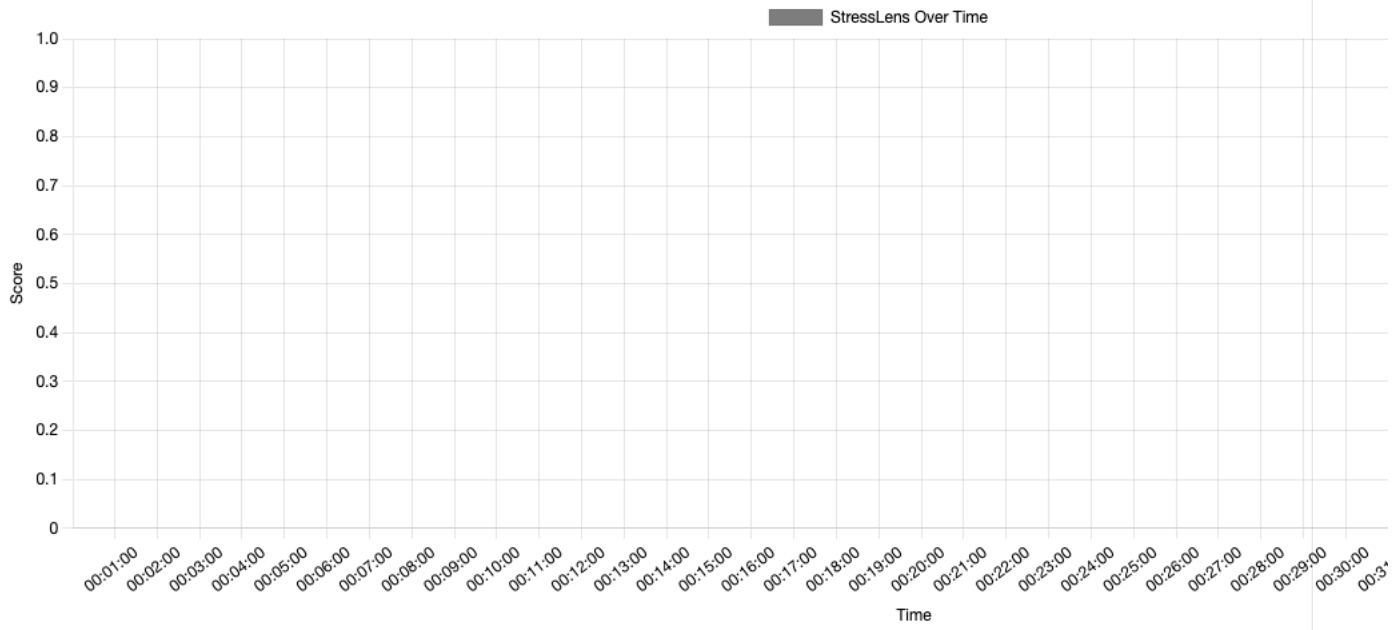
Powered by FiscalNote StressLens

Donald J. Trump

Transcripts | White House Calendar | White House Press Releases

Press Briefing: Karoline Leavitt Holds a Press Briefing at The White House - March 11, 2025

StressLens | 6 Topics | 10 Entities | Moderation | 2 Speakers



Full Transcript

Karoline Leavitt 00:00:00-00:00:00 (sec) NO STRESSLENS

How are you?

Question 00:00:00-00:00:01 (1 sec) NO STRESSLENS

Great.

Karoline Leavitt 00:00:01-00:00:33 (32 sec) NO SIGNAL (0)

Good, I'll let my staff get settled. Uh, there's a lot of news today, so I look forward to taking your questions. Good to see you. Um, and I have some updates for you as well. Later today, President Trump will address the business roundtable's quarterly

meeting where he will tout his pro-growth economic agenda and answer questions before more than 100 of our nation's leading CEOs. In fact, it's the largest attendance ever for this event because business leaders are so eager and encouraged by President Trump's return to Washington.

Karoline Leavitt 00:00:33-00:00:53 (20 sec) NO SIGNAL (0)

This follows President Trump's roundtable yesterday with the technology CEO Council here at the White House, where he met with key leaders in the technology industry. And last night, President Trump also held an official swearing in ceremony in the Oval Office for Sean Curran, who is now the 28th director of the United States Secret Service.

Karoline Leavitt 00:00:53-00:01:26 (33 sec) NO STRESSLENS

Sean demonstrated unbelievable bravery under gunfire in Butler, Pennsylvania this past July when an assassin tried to kill President Trump. As someone who got to know Sean personally throughout the campaign last year, I can say unequivocally that there is nobody better suited for this important role. And following the confirmation of Labor Secretary Lori Chavez-DeRemer last night, the Senate has now confirmed 21 of President Trump's well-qualified cabinet level nominees far outpacing the previous administration.

Karoline Leavitt 00:01:26-00:01:50 (24 sec) NO SIGNAL (0)

And looking ahead, tomorrow, the president will welcome the Taoiseach Micheal Martin, of Ireland for the annual White House -- White House Shamrock ceremony. And Thursday, President Trump will welcome the NATO secretary general for a working meeting and lunch. On the economy. February's jobs report was good news for America, particularly our manufacturing sector.

Karoline Leavitt 00:01:50-00:02:16 (27 sec) NO SIGNAL (0)

The manufacturing sector gained 10,000 new jobs in just one month under President Trump. This rebound was led by the automobile sector where we saw 9000 new auto jobs created already. That is the most auto jobs added to the economy in 15 months. This was a complete turnaround from the Biden administration where we were losing an average of 9000 manufacturing jobs per month last year.

Karoline Leavitt 00:02:16-00:02:37 (20 sec) NO SIGNAL (0)

Reuters is out with a report that a number of companies are now looking at expanding their presence or bringing their businesses into America because of President Trump's policies. And just moments ago, before coming out here, I saw another report by Reuters revealing that Merck has opened a $1 billion facility at its North Carolina site.

Karoline Leavitt 00:02:37-00:03:00 (23 sec) NO SIGNAL (0)

This is just the latest pharmaceutical company to boost its US manufacturing in lieu of President Trump's tariffs. This announcement follows Eli Lilly's plans to invest at least $27 billion to build four new manufacturing plants here in the United States. And Pfizer has also said it's considering moving their manufacturing overseas right here to the United States of America.

Karoline Leavitt 00:03:00-00:03:27 (28 sec) NO SIGNAL (0)

As the president has said over and over again, when we purchase products made in the USA, the profits stay here, the revenue stays here and most importantly, the jobs stay here. And despite the globalist mainstream media's attempts to worry consumers, President Trump will not repeat the trend of past American presidents who broke their promises to the American public and smiled while they stuck a knife in the back of American workers and shipped their jobs overseas.

NO SIGNAL (0)

Our country has lost more than 5 million jobs in more than 90,000 factories due to devastating globalization over the last three decades alone. North Carolina lost 300,000 manufacturing jobs, including 60 percent of its furniture manufacturing jobs in the years following NAFTA. And in Michigan, globalist policies destroyed 250,000 jobs, including 40 percent of the auto industry.

Karoline Leavitt 00:03:54-00:04:17 (23 sec)

NO SIGNAL (0)

Which again, we know is clawing back because of President Trump's action already. These are harrowing statistics that represent countless towns and families who have been completely destroyed. But the America last globalist era is ending under President Trump. He will no longer allow our country and our workers, our hardworking American families to be ripped off.

Karoline Leavitt 00:04:17-00:04:42 (25 sec)

NO SIGNAL (0)

On another very important issue for the president. He continues to work hard to secure the border. If you missed it yesterday, CBP launched an enhanced home mobile app with a new feature, the Intent to Depart, which offers unlawfully present aliens or those aliens whose parole has been revoked an orderly and defined process to notify the US government of their intent to depart the country.

Karoline Leavitt 00:04:42-00:05:06 (24 sec)

NO SIGNAL (0)

The CBP home app strengthens our mission to secure the border and provides illegal aliens with a straightforward way to leave now before facing much harsher consequences later. A new report from Bloomberg just found that the number of aliens trying to reach our country by traveling through the jungle to Central America dropped a whopping 99 percent last month.

Karoline Leavitt 00:05:06-00:05:29 (23 sec)

NO SIGNAL (0)

And this follows the incredible news that illegal border crossings plummeted last month as well, down 94 percent at our southern border from last February under the Biden administration. As President Trump made clear during his historic address to Congress, we must finish this job and continue to carry out the largest deportation campaign in American history.

Karoline Leavitt 00:05:29-00:05:48 (20 sec)

NO SIGNAL (0)

And that is why the president fully endorses the continuing resolution that is before Congress and was negotiated by Speaker Johnson. He is encouraging all Republicans to vote, yes, on this clean CR, which freezes funding at current levels and will prevent the Democrats from getting their long awaited government shutdown.

Karoline Leavitt 00:05:48-00:06:10 (21 sec)

NO SIGNAL (0)

Voting against this CR will hurt the American people and kill the incredible momentum that President Trump has built over the past 51 days. And lastly, before I take questions, I would like to commend The Washington Post, who I believe is in the room today. According to a new report from Axios, The Washington Post is overhauling their newsroom structure.

Karoline Leavitt 00:06:10-00:06:46 (36 sec)

NO STRESSLENS

It appears that the mainstream media, including the Post is finally learning that having disdain for more than half of the country who supports this president does not help you sell newspapers. It's not a very good business model. And that's why we have people in our new media seat. And today, we have Sagar Annette, who is the host of Breaking Points a popular political YouTube news and podcast show that has racked up nearly 1 billion views on YouTube, several hundred million

podcast downloads since its launch in June 2021. He's also a former member of the White House Correspondents Association, but is now a part of the thriving independent media.

Karoline Leavitt 00:06:46-00:06:50 (4 sec) NO SIGNAL (0)

We're very happy to have you with us here today. Why don't you kick off our briefing? Thank you.

Question 00:06:50-00:07:08 (18 sec) NO SIGNAL (0)

Really, really appreciate you having me, Karoline, a couple of questions for you, if I may. First is first on the stock market. So currently it's the 25th anniversary today of the dot-com bubble crash. There's a lot of concern for a lot of Americans right now about the state of the economy. President Trump has refused to rule out a recession.

Question 00:07:08-00:07:15 (8 sec) NO SIGNAL (0)

Secretary Lutnick, however, has told us there will not be one, so can the White House just tell and assure Americans today that there's not going to be a recession?

Karoline Leavitt 00:07:15-00:07:36 (20 sec) NO SIGNAL (0)

Well, there's a lot to unpack there. So, let me start by saying that first of all, when it comes to the stock market, the numbers that we see today, the numbers we saw yesterday, the numbers we'll see tomorrow are a snapshot of a moment in time. And as President Trump has said, and I'm here to echo the remarks of this president and of this White House, we are in a period of economic transition.

Karoline Leavitt 00:07:36-00:07:55 (19 sec) NO SIGNAL (0)

We are in a period of transition from the mess that was created under Joe Biden and the previous administration. Joe Biden left this country in an economic disaster. Several statistics to point out: the delinquency rate on credit card loans increased 63 percent under Joe Biden, hitting a near 12-year high.

Karoline Leavitt 00:07:55-00:08:34 (39 sec) NO STRESSLENS

Under Joe Biden, all net job growth went to foreign born Americans. Real wages declined by 1.5 percent under Joe Biden. And as we all know, and this administration continues to combat, prices soared more than 20 percent under Joe Biden because of his reckless spending and economic policies. So, we are in a period of transition from that economic nightmare under a president who had no idea what he was doing, never held the private sector job in his life, into a golden age of American manufacturing under a businessman and a deal maker in chief in President Donald J. Trump who will be implementing, is implementing the formula that we know works.

Karoline Leavitt 00:08:34-00:08:50 (16 sec) NO SIGNAL (0)

Look at President Trump's results in his first term. If people are looking for certainty, they should look at the record of this president. That's why the American people reelected him back to this office. And look at everything that President Trump has already done, and his team has already done in just 51 days.

Karoline Leavitt 00:08:50-00:09:16 (26 sec) NO SIGNAL (0)

The massive efforts to deregulate; tax cuts, which we need congress to pass the Trump economic agenda, the Trump tax cuts, which will unleash economic growth. And the president also addressed this directly I will point out as well, when you look at what he said on Air Force One, and he said he wants the American people to have so much money in their pockets they don't even know what to do with it. That's the intent of this administration and we're working very hard every day on that goal.

Question 00:09:16-00:09:36 (21 sec) NO SIGNAL (0)

Second question on the CR. So, President Trump came out today in a primary challenge against Congressman Thomas Massie. Congressman Massie has been a supporter of DOGE, he's been a supporter of Make America Healthy Again. What kind of message is this White House sending against a congressman who's sticking up for principles that he's long held in the chamber and voting against continuing resolution and spending?

Karoline Leavitt 00:09:36-00:10:00 (24 sec) NO SIGNAL (0)

I think the president has made it very clear that he believes it's critical for conservatives and republicans and frankly all members of congress to get behind this continuing resolution to keep the government funded. The president wants to continue the momentum that he has built over the last 51 days. In order to keep the government funded, we've got to keep moving with these deportations and he believes that everybody needs to get on board with this bill.

Karoline Leavitt 00:10:00-00:10:11 (10 sec) NO SIGNAL (0)

He's been active in this process. He's been making calls to get this over the finish line. And we're urging every republican, and democrats too, to do what's right for the American public to prevent a government shutdown.

Question 00:10:11-00:10:20 (10 sec) NO SIGNAL (0)

Just the last question here on Mahmoud Khalil. Does the administration believe that it needs to charge a green card holder with a crime to be eligible for deportation?

Karoline Leavitt 00:10:20-00:10:45 (24 sec) NO SIGNAL (0)

Well, in fact, Secretary Rubio reserves the right to revoke the visa of Mahmoud Khalil. And I'm glad you brought this up. Under the Immigration and Nationality Act, the Secretary of State has the right to revoke a green card or a visa for individuals who serve or are adversarial to the foreign policy and national security interests of the United States of America.

Karoline Leavitt 00:10:45-00:11:04 (20 sec) NO SIGNAL (0)

And Mahmoud Khalil was an individual who was given the privilege of coming to this country to study at one of our nation's finest universities and colleges. And he took advantage of that opportunity, of that privilege by siding with terrorists, Hamas terrorists who have killed innocent men, women and children.

Karoline Leavitt 00:11:04-00:11:32 (27 sec) NO SIGNAL (0)

This is an individual who organized group protests that not only disrupted college campus classes and harassed Jewish American students and made them feel unsafe on their own college campus, but also distributed pro-Hamas propaganda, fliers with the logo of Hamas. That is what the behavior and activity that this individual engaged in. And I have those fliers on my desk, they were provided to me by the Department of Homeland Security.

Karoline Leavitt 00:11:32-00:11:54 (23 sec) NO SIGNAL (0)

I thought about bringing them into this briefing room to share with all of you, but I didn't think it was worth the dignity of this room to bring that pro-Hamas propaganda. But that's what this individual distributed on the campus of Columbia University. And this administration is not going to tolerate individuals having the privilege of studying in our country and then siding with pro-terrorist organizations that have killed Americans.

Karoline Leavitt 00:11:54-00:11:59 (5 sec) NO STRESSLENS

We have a zero-tolerance policy for siding with terrorists, period. Peter Doocy.

Question 00:11:59-00:12:10 (11 sec) NO SIGNAL (0)

Thank you, Karoline. So, you said that the Dow dropping and dropping and dropping is a period of transition. You're sure nobody here at the White House shorted the Dow.

Karoline Leavitt 00:12:10-00:12:11 (1 sec) NO STRESSLENS

[Laughter] No, I don't think so.

Question 00:12:11-00:12:24 (12 sec) NO SIGNAL (0)

OK. But is there any concern here that it's going to be harder to ask certain federal workers to retire if they look at their retirement accounts and they're getting robbed every day?

Karoline Leavitt 00:12:24-00:12:59 (35 sec) NO SIGNAL (0)

Well, I'm glad you brought up workers because that's exactly who President Trump is looking out for with his America First trade policy and his America First economic agenda. And if you look at -- there's great indication to be optimistic about where the economy stands and the American people, investors, CEOs, small business owners, but most importantly workers, should bet on President Trump, because his tariff policies, what he envisions is reciprocity -- fair trade practices where American workers are put first and are no longer ripped off by foreign countries all over this world.

Question 00:12:59-00:13:07 (8 sec) NO SIGNAL (0)

President Trump says he's going to buy a Tesla today. Did he buy it? And when is the last time he drove a car?

Karoline Leavitt 00:13:07-00:13:29 (21 sec) NO SIGNAL (0)

That's a very good question. I have heard the president remark that he misses being able to drive, that luxury of driving his own vehicle, although the beast is nice. But he is going to be viewing a Tesla that is making its way to the White House complex now I can confirm. Perhaps the press pool today will have an opportunity to witness this very exciting moment later this afternoon.

Karoline Leavitt 00:13:29-00:13:36 (7 sec) NO SIGNAL (0)

But Tesla -- a Tesla is on its way here now and we'll see if the president likes it when he checks it out.

Question 00:13:36-00:13:40 (4 sec) NO SIGNAL (0)

So, they're bringing him a Tesla to look at and if he likes it, he's just going to buy it.

Karoline Leavitt 00:13:40-00:13:46 (6 sec) NO SIGNAL (0)

He's intent on -- he's definitely going to buy one. But he'll take a look at it when it gets here later this afternoon.

Question 00:13:46-00:13:47 (1 sec) NO STRESSLENS

Full retail? [Laughter]

Karoline Leavitt 00:13:47-00:13:50 (2 sec) NO STRESSLENS

Yes, full market price. Kelly?

Question 00:13:50-00:14:14 (24 sec) NO SIGNAL (0)

Can we talk about Canada? What is the status of President Trump having a conversation with Mark Carney? We have seen the president use the term governor to refer to Justin Trudeau; will that moniker also go to Mr. Carney going forward? And is the decision to increase the tariffs -- is that based on a specific economic metric that he looked at? Is it impulse?

Question 00:14:14-00:14:16 (2 sec) NO STRESSLENS

How would you describe his reaction to Canada?

Karoline Leavitt 00:14:16-00:14:42 (26 sec) NO SIGNAL (0)

The president has not yet spoken to Mr. Carney, not since I checked, which was just moments ago, but certainly his phone is always open to leaders who wish to speak with him. As for the tariffs, the president made his position on this quite clear with the statement that he put out. And it was a retaliatory statement due to the escalation of rhetoric that we've seen out of Ontario, Canada.

Karoline Leavitt 00:14:42-00:15:04 (22 sec) NO SIGNAL (0)

The president saw the premier, Doug Ford, make an egregious and insulting comment threatening to shut down electricity for the American people, for hard working American families. He made that threat. The president saw that and has an obligation and a responsibility to respond accordingly and represent the interests of the American people.

Karoline Leavitt 00:15:04-00:15:27 (23 sec) NO SIGNAL (0)

So, he has made the decision to add a 25 percent tariff. So, now steel and aluminum tariffs will come into effect tomorrow at the rate of 50 percent. And our steel and aluminum industries have actually applauded these tariffs because, again, they know it's going to grow their industry here. It's going to allow them to export more steel that is made right here in the United States with American workers.

Question 00:15:27-00:15:43 (17 sec) NO SIGNAL (0)

Egregious and insulting are your words here, but that's what many Canadian leaders have said about the actions President Trump has taken toward Canada. And what do you think the timeline is for speaking to Mr. Carney? Because normally the president -- a sitting president speaks to a close ally very quickly when there's new leadership.

Karoline Leavitt 00:15:43-00:16:09 (25 sec) NO SIGNAL (0)

Well, the president is again responding to the fact that Canada has been ripping off the United States of America and hard-working Americans for decades. If you look at the rates of tariffs across the board that Canadians have been imposing on the American people and our workers here, it is egregious. In fact, I have a handy, dandy chart here that shows not just Canada, but the rate of tariffs across the board.

Karoline Leavitt 00:16:09-00:16:31 (22 sec) NO SIGNAL (0)

If you look at Canada, since you brought it up, American cheese and butter, nearly 300 percent tariff; you look at India, 150 percent tariff on American alcohol. You think that's helping Kentucky bourbon be exported into India? I don't think so. 100 percent tariff on agricultural products from India. Look at Japan tariffing rice, 700 percent.

Karoline Leavitt 00:16:31-00:16:52 (21 sec) NO SIGNAL (0)

President Trump believes in reciprocity, and it is about dang time that we have a president who actually looks out for the interests of American businesses and workers. And all he's asking for at the end of the day are fair and balanced trade practices. And unfortunately, Canada has not been treating us very fairly at all over the past several decades.

Karoline Leavitt 00:16:52-00:16:58 (6 sec) NO SIGNAL (0)

To the woman in the purple, because I saw you were making a face at my previous answer. So, what's going on? [Laughter]

Question 00:16:58-00:17:18 (20 sec) NO SIGNAL (0)

Well, actually I have a couple of questions. At the core of pro-Palestinian protests on college campuses and elsewhere, is a demand to end the war in Gaza, a goal that this administration actually supports and has pursued. So, why has this not been acknowledged or highlighted even.

Karoline Leavitt 00:17:18-00:17:40 (21 sec) NO SIGNAL (0)

Because these colleges and these protests have again put out Hamas propaganda. The fliers that have been distributed call for violence. The fliers that have been distributed have the logo of an organization that has held Americans hostage, that murdered innocent babies, that murdered men, women and children.

Karoline Leavitt 00:17:40-00:18:14 (34 sec) NO SIGNAL (0)

They are a designated foreign terrorist organization. And we are not going to tolerate non-citizens, foreigners who come here on a visa engaging in such behavior siding with terrorists. And the Secretary of State reserves the authority to revoke the -- the green card or the visa of an individual who serves as a -- who -- actually it says right here, reasonable grounds to believe that the alien's presence or activities in the United States would have potentially serious adverse foreign policy consequences to the United States.

Karoline Leavitt 00:18:14-00:18:25 (11 sec) NO SIGNAL (0)

And I think siding with Hamas makes that quite clear. Secretary Rubio exercised that authority, and we fully believe that we are going to move forward with more arrests as President Trump previewed in his statement yesterday.

Question 00:18:25-00:18:26 (1 sec) NO STRESSLENS

Yeah, but the White House also --

Karoline Leavitt 00:18:26-00:18:26 (1 sec) NO STRESSLENS

Ed?

Question 00:18:26-00:18:27 (1 sec) NO STRESSLENS

Yeah, thanks, Karoline.

Karoline Leavitt 00:18:27-00:18:27 (1 sec) NO STRESSLENS

Go ahead.

Question 00:18:27-00:18:37 (10 sec) NO SIGNAL (0)

So are there conversations between the administration and the Canadians going on over this tariff? Because the Ontario Premier says the next step is to cut off electricity to the US.

Karoline Leavitt 00:18:37-00:19:02 (25 sec) NO SIGNAL (0)

And the president put out a statement after seeing those comments. And said that it would be -- there would be grave consequences imposed on Canada if they think about shutting off electricity for the United States of America and our citizens. And the president is also determined to ensure that we are depending on American electricity, not the electricity production of foreign nations, including our allies in Canada.

Karoline Leavitt 00:19:02-00:19:11 (8 sec) NO SIGNAL (0)

As for conversations, there is continued correspondence between the president's team, particularly Secretary Lutnick and the Canadians as well.

Question 00:19:11-00:19:21 (10 sec) NO SIGNAL (0)

And the market reaction, how do you -- how do you sell to the American people then after they're looking at what's happening in the markets this week and say that the tariff policy long term is something good?

Karoline Leavitt 00:19:21-00:19:40 (19 sec) NO SIGNAL (0)

Well, just think about what the tariff policy long term will do for our country. I think many of us probably grew up in small towns. I know at least I did. And the main street in my small town looks a heck of a lot worse than it probably did decades ago before I was alive. At least my parents and grandparents tell me so. And I know many Americans feel that same way.

Karoline Leavitt 00:19:40-00:19:59 (19 sec) NO SIGNAL (0)

What the president envisions for this country is for the United States of America to be a manufacturing superpower, where there are American factories and businesses owned by Americans producing goods that we are exporting to the rest of the world. Those revenues will stay here. It will increase wages for people here in our great country.

Karoline Leavitt 00:19:59-00:20:17 (18 sec) NO SIGNAL (0)

It will ensure our national security. And it will boost the morale of the American people to have thriving industries again. Think about Detroit, Michigan, think about North Carolina, as I mentioned. That used to have a thriving furniture industry that no longer exists because of the globalist trade policies of previous and past administrations.

Karoline Leavitt 00:20:17-00:20:28 (11 sec) NO SIGNAL (0)

And the American people gave the president a tremendous opportunity to restore American greatness and restore our manufacturing dominance. And he's intent on doing just that. John?

Question 00:20:28-00:20:49 (21 sec) NO SIGNAL (0)

Thanks, Karoline. Thanks a lot, Karoline. Two questions for you. First on the CR, you put up on the screen, the president's message to Republicans to support this continuing resolution. Is there outreach to Democrats? Because what we've seen since the beginning of the fiscal year is that in order to get a continuing resolution, you need bipartisan support, and you need compromise.

Karoline Leavitt 00:20:49-00:21:06 (17 sec) NO SIGNAL (0)

Well, right now, we are focused on House Republicans and on the House. Because that's the first step, as you know, John. And so, the president has engaged in correspondence with House Republicans whipping votes and getting them to a yes, which I understand has been pretty successful this morning thus far.

Karoline Leavitt 00:21:06-00:21:20 (14 sec) NO SIGNAL (0)

And so again, the president is encouraging Republicans especially. But again, as I said, all members of Congress to vote to continue funding this government so we can continue the business of the American people which elected President Trump to do.

Question 00:21:20-00:21:40 (21 sec) NO SIGNAL (0)

And then, on financial markets, we've seen this decline yesterday. We see it today as well. It seems that the read on the president's policies is one in which they do not have confidence in his trade tariffs policy. They do not have confidence in what the president said to Fox News over the weekend that he didn't rule out the idea of a recession.

Question 00:21:40-00:21:47 (7 sec) NO SIGNAL (0)

What is your read in terms of the decline that we've seen over the last week and a half in financial markets?

Karoline Leavitt 00:21:47-00:22:09 (22 sec) NO SIGNAL (0)

Well, I think there's actually a lot of reason to be confident. And many people do feel confident. Just look at the nearly $2 trillion in private investment that this President has secured. Look at the comments made by the CEO of Apple, one of the biggest companies in this world who said that he is bullish on the future of American innovation under the leadership of President Trump.

Karoline Leavitt 00:22:09-00:22:31 (22 sec) NO SIGNAL (0)

Look at CEO confidence. According to the Conference Board measure of CEO confidence in Q1 2025, under the leadership of this president, it jumped to its highest level in three years from cautious optimism to confident optimism. If you, again, look at the $2 trillion in investments from some of the biggest companies in the world, look at the jobs report last Friday.

Karoline Leavitt 00:22:31-00:22:55 (24 sec) NO SIGNAL (0)

As I also cited in my opening remarks, Fox business reported that Trump sees a manufacturing boom in first folds jobs report of his second term. Look at the auto jobs that have already poured back into America. We added 9000 new auto jobs. Those are sticky jobs. Those are good paying jobs. That's 9000 American families who will now be able to live the American dream because of the policies of this administration.

Karoline Leavitt 00:22:55-00:23:15 (20 sec) NO SIGNAL (0)

You also look at small business optimism. The NFIB put out a report this morning, small business optimism continues to be far higher than it ever was under the previous administration. There's a lot of reason to be optimistic. And again, the American people, CEOs and people on Wall Street and on Main Street should bet on this president.

Karoline Leavitt 00:23:15-00:23:25 (9 sec) NO SIGNAL (0)

He is a dealmaker. He is a businessman. And he's doing what's right for our country. He wants to restore wealth to the United States of America. Michael, good to see you.

Question 00:23:25-00:23:34 (9 sec) NO SIGNAL (0)

Hey, Karoline, thank you. Two questions if I may. Will the -- will the administration be providing any relief to states affected by the Ontario Power Tariff?

Karoline Leavitt 00:23:34-00:23:49 (15 sec) NO SIGNAL (0)

Well, the president has made it very clear that Canada would be very wise not to shut off electricity for the American people. And we hope that that does not happen. As for what would happen, if that does take place, I'll leave it to the president to make those decisions.

Question 00:23:49-00:23:57 (8 sec) NO SIGNAL (0)

And does President Trump share the Justice Department's concern over rising egg prices and possible collusion of Big Egg? [Laughter]

Karoline Leavitt 00:23:57-00:24:16 (20 sec) NO SIGNAL (0)

Well, we definitely -- we definitely do share the concerns of the American people when it comes to the price of eggs. However, good news, the average cost of a dozen eggs is actually down since Secretary Rollins and President Trump announced their plan. It's down $ 1.85. So that's good news on the cost of eggs.

Karoline Leavitt 00:24:16-00:24:36 (19 sec) NO SIGNAL (0)

And as we know, under the Biden administration, egg prices went up 22 percent. This is another example of an economic mess that President Trump inherited. And the Secretary of Agriculture and the president are focused on fixing it. Secretary Rollins put out a five point plan -- a four point plan rather to address this crisis.

Karoline Leavitt 00:24:36-00:24:49 (14 sec) NO SIGNAL (0)

And she has been honest and realistic with the American people as this administration always is. It will take about three to six months to get the egg supply back to where it should be. But she's focused and this administration is focused on doing that every day. Karen?

Question 00:24:49-00:25:01 (12 sec) NO SIGNAL (0)

Thanks, Karoline. Just back on the markets, you said that what we're seeing this week right now in Wall Street is a snapshot of a moment in time, but does the president think he bears any responsibility for the turmoil in the stock market this week?

Karoline Leavitt 00:25:01-00:25:16 (15 sec) NO SIGNAL (0)

Look, the president is unwavering in his commitment to restore American manufacturing and global dominance. And I think he doubled down on that this morning with his new statement and the tariffs that will be implemented tomorrow on steel and aluminum.

Question 00:25:16-00:25:32 (15 sec) NO SIGNAL (0)

And he has said recently he's not looking at the market. He said you can't really watch the stock -- the stock market, but all of the gains since Election Day have been erased in the S&P 500. At what point, how far do stocks have to fall before the president considers it a factor and changes course?

Karoline Leavitt 00:25:32-00:25:44 (12 sec) NO SIGNAL (0)

Again, as I just said, the president will look out for Wall Street and for Main Street just like he did in his first term. And people on Wall Street and Main Street should bet on this president. He's doing what's right for this country. Nick, good to see you.

Question 00:25:44-00:25:56 (12 sec) NO SIGNAL (0)

Good to see you, too. Thank you, Karoline. So is the president prepared like what we saw with Congressman Massie to pressure other Republican lawmakers into supporting this continuing resolution?

Karoline Leavitt 00:25:56-00:26:15 (19 sec) NO SIGNAL (0)

Well, he is very much, as I said, engaged in this process. He's been making calls to lawmakers on Capitol Hill. And I think his statements against Congressman Massie speak for themselves. And I will let the president put out any additional statements if he chooses to. But he fully expects all House Republicans to vote for this continuing resolution.

Question 00:26:15-00:26:24 (9 sec) NO SIGNAL (0)

And just a follow up, can we start to anticipate seeing more of the president weighing in on upcoming 2026 races like we saw this morning?

Karoline Leavitt 00:26:24-00:26:35 (10 sec) NO SIGNAL (0)

I'm not sure about that. I'm not even sure if I'm allowed to speak about that from this podium. I would check in with our outside political team for guidance on future races and the president's involvement. Elena?

Question 00:26:35-00:26:57 (22 sec) NO SIGNAL (0)

Thank you. I wanted to ask you about some comments Elon Musk made yesterday. He said that there is $500 to $700 billion in waste and fraud in entitlement spending. He called it, "the big one to eliminate." Earlier this month, he also referred to Social Security as a Ponzi scheme. Should Americans expect changes, big changes to Social Security and Medicare?

Karoline Leavitt 00:26:57-00:27:14 (17 sec) NO SIGNAL (0)

President Trump has been unequivocally clear on this. He is going to protect Social Security and Medicare benefits and Medicaid for hard working Americans who paid into these entitlement programs and deserve those hard earned benefits. And unfortunately, the mainstream media has taken Mr. Musk out of context.

Karoline Leavitt 00:27:14-00:27:43 (30 sec) NO SIGNAL (0)

I saw a Bloomberg headline that our team -- wrong, and it took Mr. Musk out of context. What he was specifically referring to cutting was the waste and the fraud and abuse that does exist in these programs. According to an IG report from the Social Security Administration, there's more than $70 billion of fraud in the Social Security program alone that we know of. And so, the president will continue to protect these programs for hard-working Americans.

Karoline Leavitt 00:27:43-00:27:48 (5 sec) NO SIGNAL (0)

And actually, cutting the waste, fraud and abuse out of these programs will protect it for hard-working Americans.

Question 00:27:48-00:28:03 (14 sec) NO SIGNAL (0)

But Karoline, respectfully -- he said around $500 billion to $700 billion, there was no evidence to claim that. And also, if that is the case, that would represent more than a third of what Social Security paid out last year, maybe 20 percent of Social Security and Medicare combined.

Karoline Leavitt 00:28:03-00:28:21 (19 sec) NO SIGNAL (0)

Again, if you read his full quote, he said we think, so it's an estimate based on what he's seen. He's not saying definitively, he's saying that's what DOGE suspects and thinks. And that's exactly why DOGE was created, to ensure that we are

investigating the fraudulent spending, the wasteful abuse across our federal government.

Karoline Leavitt 00:28:21-00:28:32 (11 sec) NO SIGNAL (0)

And I would remind everybody in this room that 77 percent of the American people support this effort by Elon Musk and DOGE to identify such waste, fraud and abuse. Go ahead. You're welcome.

Question 00:28:32-00:28:47 (15 sec) NO SIGNAL (0)

Thanks, Karoline, for doing this. If we could just step back for a second, when President Trump last addressed the BRT, when he was on the campaign trail, his big push was on tax cuts. He's going there today as he's proposing tax hikes in the form of tariffs. And I'm curious --.

Karoline Leavitt 00:28:47-00:28:48 (1 sec) NO STRESSLENS

Not true. He's not doing that.

Question 00:28:48-00:28:51 (3 sec) NO STRESSLENS

For why he's prioritizing that over the tax cuts.

Karoline Leavitt 00:28:51-00:29:12 (21 sec) NO SIGNAL (0)

He's actually not implementing tax hikes; tariffs are a tax hike on foreign countries that again have been ripping us off. Tariffs are a tax cut for the American people. And the president is a staunch advocate of tax cuts. As you know, he campaigned on no taxes on tips, no taxes on overtime, no taxes on Social Security benefits.

Karoline Leavitt 00:29:12-00:29:17 (5 sec) NO SIGNAL (0)

He is committed to all three of those things and he expects congress to pass them later this year.

Question 00:29:17-00:29:24 (7 sec) NO SIGNAL (0)

I'm sorry, have you ever paid a tariff, because I have? They don't get charged on foreign companies; they get charged on the importers.

Karoline Leavitt 00:29:24-00:29:43 (20 sec) NO SIGNAL (0)

And ultimately when we have fair and balanced trade, which the American people have not seen in decades, as I said at the beginning, revenues will stay here, wages will go up and our country will be made wealthy again. And I think it's insulting that you are trying to test my knowledge of economics and the decisions that this president has made.

Karoline Leavitt 00:29:43-00:29:47 (4 sec) NO STRESSLENS

I now regret giving a question to the Associated Press. Mary, go ahead.

Question 00:29:47-00:30:01 (14 sec) NO SIGNAL (0)

Hey, Karoline, I have two if that's OK. The first one was on Russia-Ukraine. I know Special Envoy Witkoff said yesterday that Zelenskyy apologized in his letter to Trump. Can you share any more about that letter and what else might be interesting from it that we don't know?

Karoline Leavitt 00:30:01-00:30:20 (19 sec) NO SIGNAL (0)

Yes, the president did reference that letter, as you're saying, in his joint address to congress, and I do have an update. As you know, Secretary of State Rubio and our National Security advisor Mike Waltz, have been negotiating with the Ukrainians today in Saudi. They will be providing a full readout of that meeting very soon.

Karoline Leavitt 00:30:20-00:30:42 (22 sec) NO SIGNAL (0)

But I can assure you and everybody here and the American people that the news we've received from that meeting throughout the day and the president has been briefed on is positive. This meeting has been productive. I will let Secretary Rubio and our national security -- Secretary of State Rubio and our national security advisor speak to the specifics of what has taken place today when they are ready to do so when the meeting concludes.

Karoline Leavitt 00:30:42-00:30:43 (1 sec) NO STRESSLENS

Lindsay, go ahead.

Question 00:30:43-00:30:56 (12 sec) NO SIGNAL (0)

Thank you, Karoline. According to Mahmoud Khalil, the president has said this is the first of many arrests like this. Does the administration have a rough estimate of how many arrests you're planning to make similar?

Karoline Leavitt 00:30:56-00:31:14 (18 sec) NO SIGNAL (0)

I don't have an estimate. I do know that DHS, based on very good Intel that they have gathered at the direction of the president's executive order, which made it very clear to the Department of Homeland Security that engaging, as I said, in anti-American, anti-Semitic, pro-Hamas protests will not be tolerated.

Karoline Leavitt 00:31:14-00:31:33 (20 sec) NO SIGNAL (0)

So, since the president signed that executive order, and since Secretary Noem has taken the oath at DHS, they have been using intelligence to identify individuals on our nation's colleges and universities, on our college campuses who have engaged in such behavior and activity, and especially illegal activity.

Karoline Leavitt 00:31:33-00:31:51 (17 sec) NO SIGNAL (0)

And so, I don't have a readout on how many arrests will come, but I do know that DHS is actively working on it. And I also know that Columbia University has been given the names of other individuals who have engaged in pro-Hamas activity, and they are refusing to help DHS identify those individuals on campus.

Karoline Leavitt 00:31:51-00:32:05 (14 sec) NO SIGNAL (0)

And as the president said very strongly in his statement yesterday, he is not going to tolerate that. And we expect all America's colleges and universities to comply with this administration's policy. Jasmine?

Question 00:32:05-00:32:18 (13 sec) NO SIGNAL (0)

Thank you so much, Karoline, for the question. On Canada, after all of these threats to increase tariffs or turn off electricity, I wonder, does this administration still consider Canada to be a close ally of the United States?

Karoline Leavitt 00:32:18-00:32:36 (18 sec) NO SIGNAL (0)

Well, I think Canada is a neighbor, they are a partner. They have always been an ally, perhaps they are becoming a competitor now. But as the president also laid out in his Truth Social post today, he believes that Canadians would benefit greatly from becoming the 51st state of the United States of America.

Karoline Leavitt 00:32:36-00:33:08 (32 sec) NO SIGNAL (0)

And I actually looked into some of the research about the cost of living in Canada, and the cost of living is much higher than it is here in the United States of America. The average cost of a home in Canada is much higher. In Quebec, the highest tax rate for an income of 150,000 or more is 53.3 percent, more than half of Canadians incomes they are being taxed on. So, the president has made it clear that he believes Canadians would be better served economically, militarily if they were to become the 51st state of the United States of America.

Karoline Leavitt 00:33:08-00:33:08 (sec) NO STRESSLENS

Reagan?

Question 00:33:08-00:33:20 (12 sec) NO SIGNAL (0)

Thank you, Karoline. A week ago, Attorney General Bondi said a truckload of Epstein files had been delivered to her office from the SDNY. When can we expect those files to be released to the public?

Karoline Leavitt 00:33:20-00:33:23 (3 sec) NO STRESSLENS

I would defer you to the Department of Justice. I don't have a timeline here.

Question 00:33:23-00:33:25 (2 sec) NO STRESSLENS

Do you have any update on the JFK files?

Karoline Leavitt 00:33:25-00:33:37 (11 sec) NO SIGNAL (0)

I don't. At this moment, again, I would defer you to our DNI Director Tulsi Gabbard, and also the Department of Justice. I know that they are working on that diligently as the president requested them to do. Christian?

Question 00:33:37-00:33:46 (9 sec) NO SIGNAL (0)

Thanks, Karoline. Two questions since we've been talking a lot about tariffs. Have there been any updates on standing up the External Revenue Service to collect revenue from that?

Karoline Leavitt 00:33:46-00:34:05 (19 sec) NO SIGNAL (0)

Well, we need reciprocal tariffs to go into effect first and, as you know, the president will be rolling those out on April 2nd. And then the next start of that process is collecting that revenue to ultimately create the External Revenue Service, which Secretary Lutnick is working very hard on and is quite enthusiastic about, if you have noticed from his media interviews.

Question 00:34:05-00:34:08 (3 sec) NO STRESSLENS

Can the president do that through executive action, or will it require legislation?

Karoline Leavitt 00:34:08-00:34:23 (14 sec) NO SIGNAL (0)

Well, the president already signed an executive order to direct the secretary of commerce to establish the External Revenue Service or at least to identify ways in which it can be done. I would refer you to the Department of Commerce for more on specifics on that. Sure, in the back.

Question 00:34:23-00:34:50 (27 sec) NO STRESSLENS

Thank you very much, Karoline. I have a few questions on South Korea and North Korea. First question, as you know, South Korean President Moon has been released from illegal detention. What is the reaction of the United States as an ally? Is there

a possibility of a summit with President Trump when President Moon returns?

Question 00:34:50-00:35:04 (15 sec) NO SIGNAL (0)

Second question on North Korea, Morth Korea launched the ballistic missile -- several ballistic missiles into the West Coast yesterday. What is the White House's reaction on this --

Note 00:35:04-00:35:04 (sec) NO STRESSLENS

[Crosstalk]

Karoline Leavitt 00:35:04-00:35:28 (24 sec) NO SIGNAL (0)

Sure, yes, I'll start with your question on North Korea. We condemn these actions, and we call on North Korea to stop their unlawful and destabilizing actions. As for South Korea, the US and Republic of Korea's alliance is ironclad, and the Trump administration remains in close contact with our South Korean counterparts as we work together to promote a free and open Indo-Pacific.

Karoline Leavitt 00:35:28-00:35:29 (1 sec) NO STRESSLENS

Sure.

Question 00:35:29-00:35:36 (7 sec) NO SIGNAL (0)

The first question, you didn't answer that. But release of our South Korean president from jail [Inaudible]

Karoline Leavitt 00:35:36-00:35:45 (8 sec) NO SIGNAL (0)

I don't have anything on that, but I can certainly check in with the National Security Council and get back to you. Sure, good to see you.

Question 00:35:45-00:36:04 (19 sec) NO SIGNAL (0)

Press secretary, many are concerned about the validity of President Biden's official actions and also his pardons of the possible criminal actions of individuals such as his family members and Liz Cheney as information is emerging that many of his official actions were auto signed, possibly even the pardons and without his knowledge or consent.

Question 00:36:04-00:36:21 (17 sec) NO SIGNAL (0)

Does the White House have any information available currently that Biden was actually the one that approved and signed those pardons? And second question, will the DOJ investigate whether President Biden's cognitive decline allowed unelected staff to push through radical policy and pardons without his knowing approval?

Karoline Leavitt 00:36:21-00:36:28 (7 sec) NO SIGNAL (0)

I don't know the answer to that question, but I can check in with our folks here who may know the answer to that question and get back to you. Dasha, go ahead.

Question 00:36:28-00:36:46 (19 sec) NO SIGNAL (0)

Karoline, you did a great job articulating the vision that President Trump has for what his tariffs -- he believes his tariffs can do in terms of bringing jobs back to the United States. I asked you last week about how much Americans might need to buckle up for some short-term pain. A conversation that the President and Treasury Secretary Scott Bessent have had with the people.

Question 00:36:46-00:37:11 (24 sec) NO SIGNAL (0)

I'm wondering what is the -- how high is the pain threshold for President Trump and for this White House as you watch some of the turbulence in the stock markets, as you field concerns from businesses that potentially see some of those approval ratings drop in the short term? How much is he willing to stomach that and will he stay committed to his vision for tariffs even as all of this comes up?

Karoline Leavitt 00:37:11-00:37:28 (18 sec) NO SIGNAL (0)

Well, the president has been working hard every single day to alleviate the pain that was inflicted by the previous administration through massive deregulation, through drill, baby, drill, as we like to call it, unleashing the might of our energy industry. Which we know will ultimately drive down costs for consumers here at home.

Karoline Leavitt 00:37:28-00:37:57 (29 sec) NO SIGNAL (0)

And again, as I mentioned, the president is intent on signing tax cuts for the American people to put more money back into their pockets, which will ultimately unlock consumer confidence. And again, I'll reiterate the president's words in layman's terms, as he does best. The president wants the American people to have so much more money in their pockets they don't know what to do with it. That's the goal of this administration through tariffs, through tax cuts, through deregulation and through unleashing the potential of our energy industry.

Karoline Leavitt 00:37:57-00:38:14 (17 sec) NO SIGNAL (0)

I have two more quick notes before I wrap up. Um, April 28th, I can confirm that the Philadelphia Eagles will be here at the White House to celebrate their Super Bowl victory. I know there was a lot of fake news about an invitation that wasn't sent or was sent. We want to correct the record. We sent an invitation.

Karoline Leavitt 00:38:14-00:38:38 (24 sec) NO SIGNAL (0)

They enthusiastically accepted. And you will see them here on April 28th. And lastly, on a sad note, I would like to express our condolences to Fox News and to the entire Fox family who did lose a cameraman, Craig Savage, who passed away at 61 years old recently. A very tragic death, an individual who was a great man and covered this building for many, many years.

Karoline Leavitt 00:38:38-00:38:51 (13 sec) NO SIGNAL (0)

So the entire Press Office, the Communications Office here wants to express our condolences with his family and also with Fox News. And I'll see you guys later. Perhaps you'll see the president in a Tesla later this afternoon. Have a good one.

THE SOURCE FOR NEWS ON CAPITOL HILL SINCE 1955

About Contact Us Advertise
Events Privacy RC Jobs
Newsletters The Staff Subscriptions

CQ and Roll Call are part of FiscalNote, a leading provider of political and business risk solutions. Copyright 2025 CQ and Roll Call. All rights reserved.

EXHIBIT M

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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; 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-01935

AMENDED PETITION FOR WRIT OF HABEAS CORPUS AND COMPLAINT

INTRODUCTION

1. This case concerns the government's targeted, retaliatory detention and attempted removal of a student protestor because of his constitutionally protected speech. Petitioner Mahmoud Khalil is Palestinian, a lawful permanent resident of the United States, and a recent graduate student at Columbia University. Over the last year and a half, Mr. Khalil has been a mediator, an active participant in, and at times the public face of, student protests on Columbia's campus related to Israel's military campaign in Gaza. The Trump administration has made no secret of its opposition to those protests and has repeatedly threatened to weaponize immigration law to punish noncitizens who have participated.

2. On or before March 8, 2025, Respondents adopted a policy ("the Policy") to retaliate against and punish noncitizens like Mr. Khalil for their participation in protests concerning Israel's military campaign in Gaza. Under the Policy, Respondent Marco Rubio, the Secretary of State, would make determinations that the protestors' presence or activities in the United States would have potentially serious foreign policy consequences for the United States and would compromise a compelling United States foreign policy interest. These determinations would then permit the Department of Homeland Security to seek to detain and deport the protestors.

3. Pursuant to the Policy, Respondent Rubio, the Secretary of State, purportedly made such a determination as to Mr. Khalil (the "Rubio Determination"). Secretary Rubio made this determination based on Mr. Khalil's lawful activity protected by the First Amendment: his participation in protests and his statements regarding Palestine and Israel.

4. Neither Secretary Rubio nor any other government official has alleged that Mr. Khalil has committed any crime or, indeed, broken any law whatsoever.

5. Pursuant to the Rubio Determination, the Department of Homeland Security decided to arrest Mr. Khalil, detain him, and place him in removal proceedings. On the evening of March 8, 2025, agents from the Department of Homeland Security ("DHS") arrested Mr. Khalil with no prior notice at his home and initiated proceedings to remove him from this country. After repeatedly transferring him across jurisdictions, the government ultimately detained Mr. Khalil in Louisiana, a thousand miles from his attorneys and his wife, who is a U.S. citizen and due to give birth next month.

6. During his arrest, the agents stated first that Mr. Khalil's "student visa"

was being "revoked." After learning that he was in fact a lawful permanent resident, they instead stated that status was being "revoked" too.

7. It later came to light that the Department of Homeland Security was charging Mr. Khalil with being removable based on Section 237(a)(4)(C)(i) of the Immigration and Nationality Act (the "Foreign Policy Ground") and the Rubio Determination.

8. The Rubio Determination and the government's subsequent actions, including its ongoing detention of Mr. Khalil in rural Louisiana, isolating him from his wife, community, and legal team, are plainly intended as retaliation and punishment for Mr. Khalil's protected speech and intended to silence, or at the very least restrict and chill, his speech now and in the future, all in violation of the First Amendment. Indeed, contemporaneous and subsequent statements by administration officials expressly characterize the invocation of this rarely used provision as punishment for Mr. Khalil's lawful and protected speech. The Rubio Determination and Mr. Khalil's unjustified detention also violate his due process rights. Finally, the government's unlawful Policy of targeting noncitizens for removal based on protected speech is arbitrary and capricious and contrary to law in violation of the Administrative Procedure Act, and viewpoint discriminatory in violation of the First Amendment. Accordingly, this Court should vacate the Rubio Determination and the Policy, order Mr. Khalil's immediate release, and set aside the government's unlawful policy.

PARTIES

9. Petitioner Mahmoud Khalil is a Palestinian, born in a refugee camp in Syria, who holds Algerian citizenship. He is married to a U.S. Citizen, a soon-to-be

father, a lawful permanent resident of the United States with no criminal history, and a Palestinian human rights activist on Columbia University's campus. In May 2025, he will graduate with a master's degree in public administration from the Columbia University's School of International and Public Affairs ("SIPA"), where he has been a student since January 2023. Mr. Khalil and his wife, who is eight months pregnant, live in Columbia's residential housing in New York City.

10. Respondent Donald J. Trump is named in his official capacity as the President of the United States. In this capacity, he is responsible for the policies and actions of the executive branch, including the Department of State and Department of Homeland Security. Respondent Trump's address is the White House, 1600 Pennsylvania Ave. NW, Washington, D.C. 20500.

11. Respondent William P. Joyce is named in his official capacity as the Acting Field Office Director of the New York Field Office for Immigration and Customs Enforcement ("ICE") within the United States Department of Homeland Security. In this capacity, he is responsible for the administration of immigration laws and the execution of detention and removal determinations and is a custodian of Petitioner. Respondent Joyce's address is New York ICE Field Office, 26 Federal Plaza, New York, New York 10278.

12. Respondent Caleb Vitello is the Acting Director of ICE. As the Senior Official Performing the Duties of the Director of ICE, he is responsible for the administration and enforcement of the immigration laws of the United States; routinely transacts business in the Southern District of New York; is legally responsible for pursuing any effort to remove the Petitioner; and as such is a custodian of the Petitioner.

His address is ICE, Office of the Principal Legal Advisor, 500 12th St. SW, Mail Stop 5900, Washington, DC 20536-5900.

13. Respondent Kristi Noem is named in her official capacity as the Secretary of Homeland Security in the United States Department of Homeland Security. In this capacity, she is responsible for the administration of the immigration laws pursuant to Section 103(a) of the INA, 8 U.S.C. § 1103(a) (2007); routinely transacts business in the Southern District of New York; is legally responsible for pursuing any effort to detain and remove the Petitioner; and as such is a custodian of the Petitioner. Respondent Noem's address is U.S. Department of Homeland Security, Office of the General Counsel, 2707 Martin Luther King Jr. Ave. SE, Washington, DC 20528-0485.

14. Respondent Marco Rubio is named in his official capacity as the United States Secretary of State. In this capacity, among other things, he has the authority to determine, based on "reasonable" grounds, that the "presence or activities" of a noncitizen "would have serious adverse foreign policy consequences for the United States." Following such a determination, DHS may initiate removal proceedings under 8 U.S.C. § 1227(a)(4)(C)(i) (INA § 237(a)(4)(C)(i).) In addition to his legal responsibilities under Section 237(a)(4)(C)(i), he routinely transacts business in the Southern District of New York and as such is a custodian of the Petitioner. His address is United States Department of State, 2201 C Street, NW, Washington, D.C. 20520.

15. Respondent Pamela Bondi is Attorney General of the United States. In this capacity, she routinely transacts business in the Southern District of New York; is responsible for the administration of the immigration laws pursuant to Section 103(a) of the INA, 8 U.S.C. § 1103(g) (2007); and as such is a custodian of the Petitioner.

Respondent Bondi's address is U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530- 0001.

JURISDICTION & VENUE

16. The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 2241, Article I, § 9, cl. 2 (the Suspension Clause) and Article III of the U.S. Constitution, the Administrative Procedure Act, 5 U.S.C. § 701 et seq.; and 28 U.S.C. § 2201 (Declaratory Judgment).

17. An actual and justiciable controversy exists between the parties under 28 U.S.C. § 2201, and this Court has authority to grant declaratory and injunctive relief. *Id.* §§ 2201, 2202. The Court has additional remedial authority under the All Writs Act, 28 U.S.C. § 1651.

18. Venue is proper in the Southern District of New York Under 28 U.S.C. § 2241 and 28 U.S.C. § 1391. Petitioner is detained at the direction of Mr. Joyce, and a substantial part of the events giving rise to the claims and relevant facts occurred within this district. Moreover, according to the federal government's official records at the time of filing, Mr. Khalil was detained at 26 Federal Plaza at the time this habeas was initiated. The New York Field Office and Respondent Joyce directed Mr. Khalil's arrest and detention in New York, New York; told his counsel that he was being taken to 26 Federal Plaza in New York, New York; and entered his location on the ICE detainee locator as being in New York, New York. At the time of filing, the detainee locator stated that Mr. Khalil was held in New York, New York, information upon which his counsel reasonably relied to identify his location. To the extent the New York Field Office and Respondent

Joyce moved Mr. Khalil across state lines to New Jersey for a transitory period of time shortly before his habeas was filed, the New York Field Office prevented Mr. Khalil from communicating that information to his counsel in bad faith. Moreover, the New York Field Office then brought Mr. Khalil back across state lines to New York before then transferring him, after the filing of the instant petition, to Louisiana.

FACTS

Mr. Khalil's Background

19. Petitioner Mahmoud Khalil is Palestinian, but he grew up in a Palestinian refugee camp in Syria because his grandparents were forcibly removed from their ancestral home in Tiberias, Palestine. When war broke out in Syria, his family was again displaced and are now dispersed throughout Europe and West Asia.

20. Mr. Khalil entered the United States on a student visa in or around December 2022 to pursue a Master's degree in Public Administration from the Columbia University's School of International and Public Affairs ("SIPA"). Mr. Khalil completed his program in December 2024, and has an anticipated graduation date of May 2025.

21. Mr. Khalil became a Lawful Permanent Resident in 2024. Mr. Khalil and his wife, a U.S. citizen, are expecting their first child next month, in April 2025. Together, they live in an apartment building owned and operated by Columbia University.

Mr. Khalil's Student Activism and Speech on Matters of Public Concern

22. As a Palestinian, Mr. Khalil has felt compelled to be an outspoken

advocate for Palestinian human rights and, since October 2023, has spoken repeatedly about Israel's military operation in Gaza. Mr. Khalil has called Israel's actions in Gaza a genocide and criticized Columbia University for, in his view, financing and in other ways facilitating such violence. Mr. Khalil is committed to peaceful protest and being a voice for his people.

23. That commitment has taken on many forms. For example, in April 2023, Mr. Khalil became co-president of the Palestine Working Group at the School of International and Public Affairs (SIPA), where he helped organize educational events and lectures on Palestine. In the fall of 2023, Mr. Khalil became president of the Palestinian Student Society at Columbia (DAR), which "serves to engage with and celebrate Palestinian culture, history, and identity."

24. Additionally, Mr. Khalil has acted as a mediator and negotiator, facilitating dialogue between Columbia University's administration and its students. In this role, Mr. Khalil has advocated for his peers to be treated humanely and fairly by the university, while helping to ensure student safety and the smooth functioning of the university. For example, in the Spring of 2024, Mr. Khalil facilitated negotiations between members of the Gaza Solidarity Encampment[1] and the university administration. Indeed, Mr. Khalil was approached to take on this role because of his prior work at a British Embassy overseas, an internship with the United Nations in New York, as well his established relationships with the university administration.

25. Mr. Khalil stated in a CNN interview in Spring of 2024 that "as a

[1] *See* Isha Banerjee, *Timeline of the Gaza Solidarity Encampment*, Columbia Spectator (May 2, 2024), *available at* https://www.columbiaspectator.com/news/2024/05/02/timeline-the-gaza-solidarity-encampment/.

Palestinian student, I believe that the liberation of the Palestinian people and the Jewish people are intertwined and go hand-by-hand and you cannot achieve one without the other." Mr. Khalil also explained that the student movement "is a movement for social justice and freedom and equality for everyone."[2]

26. Mr. Khalil's prominence as an outspoken student activist, along with Columbia University's position as a national focal point of student protests against Israel's military campaign in Gaza over the past year and a half, has propelled Mr. Khalil into the public eye. His visibility has been further amplified through his continued participation in interviews with national and international media outlets, including the BBC and CNN, as well as local press conferences.

27. Mr. Khalil's speech regarding international law, the obligations that the U.S. and Columbia University have under that law, the human rights of the Palestinian people, and related matters is speech protected by the First Amendment, including because it is speech on matters of public concern and is political speech at the core of the protection of the First Amendment.

28. Like many student activists advocating for Palestinian rights, Mr. Khalil has endured immense scrutiny and personal attacks by private actors, including doxing and harassment. But until recently, he understood that because of the First Amendment, the government would not be able to retaliate against or punish him for his speech, or silence him by locking him up or banishing him from the country, even if powerful

[2] Chelsea Bailey, *Who is Mahmoud Khalil? Palestinian activist detained by ICE over Columbia University protests*, CNN (March 11, 2025), *available at*: https://www.cnn.com/2025/03/11/us/mahmoud-khalil-columbia-ice-green-card-hnk/index.html. Chelsea Bailey, *Who is Mahmoud Khalil? Palestinian activist detained by ICE over Columbia University protests*, CNN, *available at*: https://www.cnn.com/2025/03/11/us/mahmoud-khalil-columbia-ice-green-card-hnk/index.html.

government officials disagreed with what he had to say.

The Federal Government's Hostile Campaign Against Palestinian Rights Advocacy: A Concerted Effort to Silence Protected Political Speech

29. In the fall of 2023, students from diverse racial, ethnic, religious, and socioeconomic backgrounds—including Mr. Khalil—began to mobilize on their campuses, many criticizing what they characterized as their universities' and the United States government's unwavering support for Israel's policies. These protests included Jewish students who sought to convey the message that such policies were "not in our name." In response, opponents of these students' messages—including President Donald J. Trump—frequently characterized peaceful protest and any speech in favor of Palestinian rights as inherently supportive of Hamas and antisemitic. For example, in several instances, he President Trump described a Jewish lawmaker who had criticized Israeli Prime Minister Benjamin Netanyahu as "a proud member of Hamas" and "a Palestinian," using "Palestinian" as a slur.[3]

30. During his campaign for re-election, President Trump repeatedly vowed to revoke the visas of international students engaged in pro-Palestinian protests or who publicly criticized Israel's actions.

31. For example, at a rally in Las Vegas on October 28, 2023, Trump pledged to "terminate the visas of all of those Hamas sympathizers, and we'll get them off our

[3] Niha Masih, *Trump draws condemnation for using 'Palestinian' as a slur against Schumer*, Washington Post (March 13, 2025), https://www.washingtonpost.com/politics/2025/03/13/trump-schumer-palestinian-slur/. Indeed, in his first term, President Trump also issued Executive Order 13899, titled "Combating Anti-Semitism," which, among other things, adopted a definition of antisemitism that includes plainly protected criticism of Israel and its policies. *See* 84 Fed. Reg. 68779 (Dec. 11, 2019) (including as an example of antisemitism "drawing comparisons of contemporary Israeli policy to that of the Nazis").

college campuses, out of our cities, and get them the hell out of our country."[4]

32. While the Gaza Solidarity encampments at college campuses took place in the Spring of 2024, Trump promised campaign donors that he would deport pro-Palestinian student demonstrators to get them to "behave." Upon information and belief, at a round table event in New York, he stated, "One thing I do is, any student that protests, I throw them out of the country. You know, there are a lot of foreign students. As soon as they hear that, they're going to behave."[5]

33. Similarly, in a social media post on his official X account on October 15, 2023, then-Senator Marco Rubio, referring to ongoing student protests in support of Palestinians, stated the U.S. should "cancel the visa of every foreign national out there supporting Hamas and get them out of America."[6]

President Trump Issues Executive Orders to Target Speech of Noncitizen Protestors

34. Shortly after assuming office on January 20, 2025, President Trump signed two executive orders aimed at fulfilling the above campaign promises: Executive Order 14161, titled "Protecting the United States from Foreign Terrorists and other National Security and Public Safety Threats," signed on January 20, 2025, and Executive Order 14188, titled "Additional Measures to Combat Anti-Semitism," signed on January

[4] Andrea Shalal and Susan Heavey, *Trump administration to cancel student visas of pro-Palestinian protesters*, Reuters (Jan. 29, 2025), available at: https://www.reuters.com/world/us/trump-administration-cancel-student-visas-all-hamas-sympathizers-white-house-2025-01-29/.29, 2025), available at: https://www.reuters.com/world/us/trump-administration-cancel-student-visas-all-hamas-sympathizers-white-house-2025-01-29/

[5] *Trump told donors he will crush pro-Palestinian protestors*, Washington Post, available at: https://www.washingtonpost.com/politics/2024/05/27/trump-israel-gaza-policy-donors/.

[6] Twitter, *available at*: https://x.com/marcorubio/status/1713652113098539120. In the CNN interview he included as part of the same post, then-Senator Rubio stated that "people marching at universities" were "supporters of Hamas" and "need to go."

29, 2025.

35. Executive Order 14161 states that it is the United States' policy to "protect its citizens" from noncitizens who "espouse hateful ideology." It further articulates the administration's desire to target noncitizens who "advocate for, aid, or support designated foreign terrorists and other threats to our national security," those who hold "hateful" views, and those who "bear hostile attitudes toward [America's] citizens, culture, government, institutions, or founding principles." The order's broad framing of "hostile attitudes" towards the American government could encompass any form of political dissent, including Palestinian rights advocacy.

36. Executive Order 14188 states that, in order to "combat campus anti-Semitism," the administration will target for investigation "post-October 7, 2023, campus anti-Semitism." The order adopts a definition of antisemitism that includes constitutionally protected criticism of the Israeli government and its policies.[7] In a fact sheet accompanying Executive Order 14188, the White House described the measure as "forceful and unprecedented," specifically targeting "leftist, anti-American colleges and universities." It framed the order as a "promise" to "deport Hamas sympathizers and revoke student visas," sending a clear message to all "resident aliens who participated in pro-jihadist protests" that the federal government "will find you… and deport you."

The Government Responds to Groups Identifying Noncitizen Protestors for Deportation By Adopting the Unlawful Policy

37. In response to these Executive Orders and as part of an escalating attack

[7] *See supra* note 3 (describing definitions adopted in Executive Order 13899, titled "Combating Anti-Semitism," 84 Fed. Reg. 68779 (Dec. 11, 2019), and reaffirmed in Executive Order 14188).

on the core political speech at issue, prominent groups at Columbia University opposed to Palestinian rights protests began publicizing names of individuals they wanted the government to deport. Specifically, these groups compiled lists of students who had engaged in Palestine-related advocacy and, upon information and belief, submitted these lists to ICE's tip line.[8]

38. For example, Betar USA—a self-described "Zionist activist organization"[9]—has published lists of Columbia student protestors, urging ICE to deport them under the executive orders. In a statement to a media outlet, Betar stated that it had "already submitted names of hundreds of terror supporters to the Trump administration."[10]

39. Betar identified Mr. Khalil, specifically, as one of its targets for deportation, including him on their "deport list." On January 29, the organization posted on social media that ICE is "aware of his home address and whereabouts" and confirmed that they "have provided all his information to multiple contacts."[11]

40. Media reports in March of this year described widespread fear of retaliation for pro-Palestine speech among noncitizen students, noting that the executive

[8] https://theintercept.com/2025/02/15/columbia-alumni-israel-whatsapp-deport-gaza-protesters/

[9] https://betarus.org/; https://www.middleeasteye.net/explainers/betar-who-is-far-right-jewish-american-group-blood-gaza

[10] Nicholas Liu, *A pro-Israel group says it gave the Trump administration a list of students to deport*, Salon.com (Jan. 31, 2025), *available at* https://www.salon.com/2025/01/31/pledged-to-deport-pro-palestine--and-a-pro-israel-group-has-already-made-a-list/.

[11] https://x.com/Betar_USA/status/1884796686020550930. This social media post falsely accused Mr. Khalil of saying inflammatory statements. *See id. See also* https://zeteo.com/p/scoop-emails-show-mahmoud-khalil-ask-columbia-protection-ice

orders "already appear to be chilling political activism."[12]

41. Then, the week beginning Monday, March 3, 2025, ICE was spotted on Columbia's campus, increasing fears and further chilling students' ability to speak freely.

42. That same week, pro-Israel activists reportedly met with members of Congress as well as Secretary of State Rubio, specifically seeking Mr. Khalil's deportation.[13]

43. On March 7, 2025, Mr. Khalil emailed the Columbia University interim president writing that, "I haven't been able to sleep, fearing that ICE or a dangerous individual might come to my home."[14]

44. On or before March 8, 2025, Respondents adopted the Policy by which they would retaliate against and punish noncitizens like Mr. Khalil for their participation in protests concerning Israel's military campaign in Gaza. Under the Policy, Respondent Rubio, the Secretary of State, would make determinations that the protestors' presence or activities in the United States would have potentially serious foreign policy consequences for the United States and would compromise a compelling United States foreign policy interest. These determinations would then permit the Department of Homeland Security to seek to detain and deport the protestors

DHS Arrests Mr. Khalil as a First Implementation of the Policy and a "Blueprint" for Future Investigations and Deportations of Prominent Student Activists

45. On the evening of March 8, 2025, at approximately 8:30 p.m., Mr.

[12] https://www.npr.org/2025/03/03/nx-s1-5307187/trump-executive-order-visa-pro-palestinian-foreign-students-protests-hamas-hezbollah-israel
[13] https://forward.com/news/703018/mahmoud-khalil-columbia-cuad-ice/
[14] https://zeteo.com/p/scoop-emails-show-mahmoud-khalil-ask-columbia-protection-ice

Khalil and his wife were returning to their apartment from an Iftar[15] dinner at a friend's home.

46. When Mr. Khalil and his wife arrived at their apartment building, two individuals in plain clothes followed them into the lobby of the apartment building, which is owned and operated by Columbia University.

47. The individuals approached Mr. Khalil and asked, "Are you Mahmoud Khalil?" When Mr. Khalil answered in the affirmative, the men identified themselves as being with the Department of Homeland Security ("DHS") and announced that they had to take Mr. Khalil into custody. Mr. Khalil heard them announce on a radio, "he's here," at which point Mr. Khalil noticed two other individuals approach from inside of the building. Based on their location, they would have required a key or otherwise been given permission to enter the building.

48. Mr. Khalil asked whether the agents had a warrant and they said that they had one on the phone and that they would show it to him. However, the agents never showed him a warrant. Mr. Khalil asked why they were here and they asserted that Mr. Khalil's visa was revoked. Mr. Khalil explained that he has a green card. At this point, the agents were creating a barrier between Mr. Khalil and his wife. The agents threatened Mr. Khalil's wife that she would also be arrested if she did not comply.

49. Mr. Khalil called his attorney, Amy Greer. Attorney Greer spoke with an agent who identified himself as Special Agent Elvin Hernandez. Agent Hernandez stated

[15] Iftar is the name of the evening meal eaten at sunset by Muslims to break their fast during the holy month of Ramadan.

they had an administrative warrant and that Mr. Khalil's student visa had been revoked by the U.S. Department of State and therefore they were detaining him. Despite several requests by Mr. Khalil to see the warrant, the agents never showed him the administrative warrant.

50. Mr. Khalil's wife then went to the apartment to retrieve Mr. Khalil's immigration documents. She saw another individual in plain clothes on their floor of the apartment building holding a radio.

51. Attorney Greer advised Agent Hernandez that Mr. Khalil is a lawful permanent resident and has the right to due process. Agent Hernandez responded that the Department of State had revoked Mr. Khalil's green card, too, and that he would be brought in front of an immigration judge. Agent Hernandez stated that he would be taking Mr. Khalil to 26 Federal Plaza, the location of the ICE Field Office in Manhattan, New York. When Attorney Greer began to ask more questions, Agent Hernandez hung up on her. When Mr. Khalil requested to call her back, Agent Hernandez refused to allow Mr. Khalil to speak to his attorney again.

52. Mr. Khalil's wife presented the DHS agents with documents confirming Mr. Khalil's status as a lawful permanent resident, handing them to an agent who was speaking on the phone. The agent looked confused when he saw the documents and said, "He has a green card" to the individual with whom he was on the phone. Mr. Khalil's wife heard the agent repeat that they were being ordered to bring Mr. Khalil in anyway.

53. The agents then handcuffed Mr. Khalil and brought him outside where

there were multiple unmarked vehicles waiting. Mr. Khalil's wife asked for the names of the agents, their contact information, and how to reach them to follow up on her husband's detention, but they only advised her that Mr. Khalil would be taken to 26 Federal Plaza and otherwise refused to speak with her. They left her no business card or any information at all as to how to find out where her husband would be taken, on what grounds, or who she could contact.

54. The night of the arrest, Attorney Greer checked the ICE Detainee Locator ("ICE Locator") several times to confirm her client's location. She first checked the locator at 10:00 p.m. on Saturday, March 8th and found that Mr. Khalil was not yet listed in the system. She checked again at 1:35 a.m. on Sunday, March 9th, and saw that Mr. Khalil was listed as being in custody in New York. The ICE Locator entry also included an instruction to contact the New York field office. At 4:29 a.m. on Sunday, March 9,[16] Attorney Greer checked the locator once more, and the information remained the same. Shortly thereafter, at around 4:40 a.m. on Sunday, March 9th, Attorney Greer filed the original habeas corpus petition in in this case (ECF 2) in the Southern District of New York, based on information and belief that ICE was still holding Mr. Khalil at 26 Federal Plaza. During this time, Mr. Khalil made continuous requests to contact his attorney, including when agents asked him to sign several documents, but he was repeatedly denied.

55. The next morning, around 8:30 a.m. on Sunday, March 9, the ICE locator indicated that Mr. Khalil was still in New York. Sometime after 9 a.m. on Sunday, the

[16] Daylight Saving time began on March 9, meaning that clocks moved forward from 1:59am to 3am over the course of these events.

ICE locator changed to say that Mahmoud was detained in Elizabeth, New Jersey, at the Elizabeth Contract Detention Facility, a detention center privately owned and operated by the corporation CoreCivic. At 9:29 am, Mr. Khalil's immigration attorney attempted to call the Elizabeth facility twice, but no one answered. Around 11:20 a.m., Mahmoud's wife went to the Elizabeth Detention Center to see him, but she was told that Mahmoud was not showing up in the system.

56. At 1:47 p.m. on Sunday, March 9, after counsel had submitted a G-28 and sent a 1:22 p.m. email to ICE asking to be connected with him immediately, ICE responded by email informing that Mr. Khalil was in the process of being transferred to a detention facility within the New Orleans ERO Field Office, over 1,000 miles away.[17] Counsel emailed the U.S. Attorney's Office for the Southern District of New York, which confirmed that Mr. Khalil was en route to Louisiana. Counsel requested Mr. Khalil's immediate return, but was told that ICE would not consent to his return absent a court order. When Mr. Khalil's counsel attempted to schedule a telephone call with Mr. Khalil—a process that typically occurs the same day or the next day in New York—authorities in the Louisiana ICE detention facility offered a date ten days away.

57. Mr. Khalil's wife, who is 8-months pregnant, is unable to travel to Louisiana to see Mr. Khalil.

Mr. Khalil's Experience being Transferred Repeatedly and in Detention in Louisiana

58. While at 26 Federal Plaza on the night of March 8, the ICE agents took Mr.

[17] According to the copy of the NTA that Mr. Khalil's Counsel received on March 11, ICE was already preparing to transfer Mr. Khalil to the Central Louisiana ICE Processing Center while he was still detained at 26 Federal Plaza a few hours after his arrest.

Khalil's biometrics. As they did so, Mr. Khalil saw an agent approach Agent Hernandez and say, "the White House is requesting an update."

59. Mr. Khalil was subsequently presented with several documents and asked to sign them, including a Notice to Appear ("NTA") for removal proceedings and a Custody Determination document. Mr. Khalil reviewed the NTA and Custody Determination and, because he did not fully understand the implications of signing them, he requested to speak with his lawyer before doing so. The ICE agent denied his request, prompting Mr. Khalil to refuse to sign.

60. The copy of the NTA states "YOU ARE ORDERED to appear before the immigration judge of the United States Department of Justice at: 830 Pinehill Rd, Jena, LA, 71342, LASALLE DETENTION FACILITY on March 27, 2025 at 8:30 AM to show why you should not be removed from the United States based on the charges set forth above." The copy is dated March 9, 2025, timestamped at 12:40 a.m., and signed by Supervisory Special Agent Timothy Moran at 26 Federal Plaza, New York, NY.

61. At some point in the night, Mr. Khalil was transported in handcuffs and shackles to Elizabeth Detention Center in New Jersey ("Elizabeth") but was not allowed to take his belongings—his shoes, jacket, and belt—with him. When Mr. Khalil asked about his belongings, he was told that he would be coming back to 26 Federal Plaza tomorrow, but that he could not spend the night there.

62. While at Elizabeth, Mr. Khalil again requested to speak with his lawyer, to which the officers responded that he would be allowed to do so after he was processed. Mr. Khalil spent the night in the cold waiting room for processing. Mr. Khalil requested a blanket but was denied. The next morning, as Mr. Khalil reached the front of the line to be

processed, he was informed that processing would not be completed because ICE was coming from New York to transport him.

63. Around 12 p.m., ICE officers—one of whom Mr. Khalil believes he recognized from the night before at 26 Federal Plaza—handcuffed and shackled Mr. Khalil and placed him in a van. The van had Mr. Khalil's belongings inside that were kept in 26 Federal Plaza. Mr. Khalil was told he was then going to JFK without further clarification.

64. At JFK, he was transferred to other government agents. None of the agents identified themselves or provided their badge information. At one point, Mr. Khalil noticed one of the agents received a text message instructing not to let his escort, Mr. Khalil, use his phone.

65. Mr. Khalil took an American Airlines flight from JFK around 2:45 p.m. to Dallas, Texas. During that flight, Mr. Khalil saw one of the officers receive a text message that instructed him not to let Mr. Khalil have a phone call.

66. Mr. Khalil arrived in Dallas, Texas around 5:30 p.m. and remained there until 9:30 p.m., at which time he was placed on another American Airlines flight—this time to Alexandria, Louisiana.

67. Mr. Khalil arrived in in Alexandria, Louisiana around 1:00 a.m. on Monday March 10. Upon his arrival, he saw between about four to five agents waiting for him. He was again shackled and placed in handcuffs. He was then placed in an ICE car, driven for about a minute, and then placed in a police car. The agents drove him to Jena, Louisiana.

68. Throughout this process, Mr. Khalil felt as though he was being kidnapped. He was reminded of prior experience fleeing arbitrary detention in Syria and

forced disappearance of his friends in Syria in 2013. It was shortly after this that Mr. Khalil left Syria.

69. At no time throughout this process did any of the agents identify themselves.

70. Mr. Khalil then arrived at the Louisiana Detention Facility, where he was processed again. During his initial medical examination in Elizabeth, Mr. Khalil notified agents that he has an ulcer and needs to take his medication for it every day. Despite this, he was not given access to his medication until Tuesday evening. He sleeps in a bunker without a pillow or blanket. He continues to worry about the wellbeing of 8-month pregnant wife and what will happen to them. He's also very concerned about missing the birth of his first child. In fact, Mr. Khalil turned down job offers that would have required him to miss the birth of his child. Throughout his wife's pregnancy, Mr. Khalil has been present for her doctor appointments.

71. Mr. Khalil also recently secured a coveted job position after four months of searching, and was scheduled to start this role in April of this year. In addition to fearing the loss of his expected salary, Mr. Khalil and his wife planned to obtain medical insurance through this role in order to cover health care costs, including for the birth and care of their expected child. Mr. Khalil continues to worry about the loss of income and health care, especially so close to the expected birth of his child.

72. It is very important to Mr. Khalil to be able to continue his protected political speech, advocating and protesting for the rights of Palestinians—both domestically and abroad. Indeed, Mr. Khalil was recently invited to go to Copenhagen to

attend the premiere of a documentary in which he is featured and to speak on the panel after the premiere.

The Government Confirms that Mr. Khalil was Targeted for Deportation Because of His Protected Political Speech, in the First Implementation of their Policy

73. On March 9, President Trump issued a statement on Truth Social applauding ICE for arresting Mr. Khalil, whom he described as a "Radical Foreign Pro-Hamas Student on the campus of Columbia University." The President warned that Mr. Khalil's arrest was "the first of many to come," declaring that his administration would not tolerate "students at Columbia and other universities across the country who have engaged in pro-terrorist, anti-Semitic, anti-American activity," while promising to "find, apprehend, and deport these terrorist sympathizers from our country."[18]

74. The White House reposted President Trump's statement on the social media platform X, accompanied by a mug-style graphic featuring an image of Mr. Khalil. Surrounding the photo were the words "ARRESTED BY ICE ON MARCH 9, 2025" and "LED ACTIVITIES ALIGNED TO HAMAS." The White House caption included the phrase "SHALOM, MAHMOUD" before quoting the President's statement.[19]

75. Secretary of State Marco Rubio stated, "We will be revoking the visas and/or green cards of Hamas supporters in America so they can be deported."[20]

76. The following day, the Department of Homeland Security issued a statement through its social media account, X, confirming Mr. Khalil's arrest by ICE was

[18] https://truthsocial.com/@realDonaldTrump/posts/114139222625284782
[19] https://x.com/WhiteHouse/status/1899151926777749618
[20] https://x.com/marcorubio/status/1898858967532441945

carried out "in support of President Trump's executive orders prohibiting anti-Semitism, and in coordination with the Department of State." The statement also accused Mr. Khalil of having "led activities aligned to Hamas, a designated terrorist organization" and asserted that both "ICE and the Department of State are committed to enforcing President Trump's executive orders and to protecting U.S. national security."[21]

77. In a statement to The Free Press on March 10, a White House official stated that Mr. Khalil was a 'threat to the foreign policy and national security interests of the United States' and that the federal government's "basis" for targeting Mr. Khalil was being used "as a blueprint for investigations against other students."[22]

78. On March 11, in response to an inquiry from the NY Times regarding Mr. Khalil's arrest, a spokesperson for the administration reportedly stated that "United States' foreign policy includes combating antisemitism across the globe and that Mr. Khalil's residency in the nation undermines that policy objective."[23]

79. At a White House Press Briefing on March 11, Press Secretary Karoline Leavitt responded to questions about the arrest, asserting that the Secretary of State has "the right to revoke a green card or a visa for individuals who serve or are adversarial to the foreign policy and national security interest" and accusing Mr. Khalil of "siding with terrorists."[24]

80. In a press conference regarding this case on March 12, 2025, Secretary of

[21] https://x.com/DHSgov/status/1898908955675357314; https://www.columbiaspectator.com/news/2025/03/10/department-of-homeland-security-confirms-arrest-of-palestinian-activist-mahmoud-khalil-sipa-24/

[22] https://www.thefp.com/p/the-ice-detention-of-a-columbia-student

[23] https://archive.ph/rD4sk#selection-1147.0-1159.428

[24] https://www.c-span.org/program/white-house-event/white-house-daily-briefing/657022 (timestamp 10:16)

State Rubio stated, "if you tell us that you are in favor of a group like this [Hamas], and if you tell us . . . I intend to come to your country as a student, and rile up all kinds of anti-Jewish . . . anti-Semitic activities," and "if you end up having a green card . . . we're going to kick you out."[25]

81. On March 13, 2025, when asked to justify the government's actions, Troy Edgar, the Deputy Secretary of DHS, did not dispute that Mr. Khalil had not broken any laws and instead asserted that he was "agitating and supporting Hamas" by "put[ting] himself in the middle of the process of basically pro-Palestinian activity." When asked directly if "any criticism of the Israeli government [is] a deportable offense," if "any criticism of the United States [is] a deportable offense," if "any criticism of the government [is] a deportable offense," and if "protesting [is] a deportable offense," Deputy Secretary Edgar did not dispute any of those statements.[26]

DHS Invokes the INA's Foreign Policy Ground against Mr. Khalil, in violation of the INA and the Constitution

82. Mr. Khalil's counsel did not receive DHS's asserted legal basis for his arrest and detention until the afternoon of Tuesday, March 11, pursuant to an agreement with counsel for the government. His NTA states "the Secretary of State has determined that your presence or activities in the United States would have serious adverse foreign policy consequences for the United States." Citing Section 237(a)(4)(C)(i) of the Immigration and Nationality Act (the Foreign Policy Ground), the NTA further states "the Secretary of State has reasonable ground to believe that your presence or activities in the

[25] http://state.gov/secretary-of-state-marco-rubio-remarks-to-press/
[26] NPR, *Morning Edition* (March 13, 2025), *available at* https://www.npr.org/2025/03/13/nx-s1-5326015/mahmoud-khalil-deportation-arrests-trump.

United States would have potentially serious adverse foreign policy consequences for the United States."

83. The Rubio Determination was exclusively motivated by Mr. Khalil's lawful, constitutionally-protected past, current, or expected beliefs, statements, or associations. Public statements by government officials, up to and including the President and Secretary of State, establish that Respondents are punishing, detaining, and attempting to silence Mr. Khalil because of his constitutionally-protected past, current, or expected beliefs, statements, or associations.

84. The Foreign Policy Bar expressly prohibits the Secretary of State from issuing a policy to exclude or condition entry based on a noncitizen's "past, current, or expected beliefs, statements, or associations, if such beliefs, statements, or associations would be lawful within the United States," unless the Secretary personally certifies to Congress that admitting the individual would compromise a compelling U.S. foreign policy interest. *See id.* (citing INA § 212(a)(3)(C)(iii)). Upon information and belief, Secretary Marco Rubio has not provided any certifications regarding a determination under the Foreign Policy Ground concerning Mr. Khalil to the chairs of the House Foreign Affairs, Senate Foreign Relations, and House and Senate Judiciary Committees, as required by 8 U.S.C. § 1182(a)(3)(C)(iv).

85. Nor could he. Legislative history reveals that Congress intended to limit the Executive's authority to exclude noncitizens based on their speech or beliefs. When the Moynihan Amendment was passed in 1987, the Senate Committee warned that "[f]or many years, the United States has embarrassed itself by excluding prominent foreigners

from visiting the United States solely because of their political beliefs." The amendment was intended "to take away the executive branch's authority to deny visas to foreigners solely because of the foreigner's political beliefs or because of his anticipated speech in the United States," while affirming "the principles of the First Amendment." (S. Rep. No. 100–75 at 11, 100th Cong., 1st Sess. (1987), reprinted in 133 Cong. Rec. S2326 (1987)).

86. Congress further evinced its intent to restrict the Executive's ability to exclude foreign speakers by asserting that such exclusions should not be based solely on "the possible content of an alien's speech in this country," that the Secretary's authority to determine that entry would compromise foreign policy interests should be used "sparingly and not merely because there is a likelihood that an alien will make critical remarks about the United States or its policies," and that the "compelling foreign policy interest" standard should be applied strictly. (H.R. Conf. Rep. No. 101-955, 101st Cong., 2nd Sess. (1990), reprinted in 1990 U.S.C.C.A.N. 6784, 6794).

87. In the decades since the Foreign Policy Ground was enacted, it appears to have been rarely invoked and reserved for cases involving high-ranking government officials or an alleged terrorist removable on other grounds and subject to high-profile prosecutions in their country of origin. It does not appear to have ever been applied to any person for engaging in First Amendment protected speech.

CLAIMS FOR RELIEF

FIRST CLAIM
Violation of the First Amendment to the United States Constitution

88. Petitioner repeats and re-alleges the allegations contained in the preceding

paragraphs of this Complaint-Petition as if fully set forth herein. The First Amendment to the United States Constitution provides in part that "Congress shall make no law . . . abridging the freedom of speech . . . or the right of the people . . . to petition the Government for a redress of grievances." U.S. Const. Amend. I. The First Amendment protects past, present, and future speech, including speech by noncitizens.

89. The Rubio Determination and Policy Mr. Khalil's targeting, arrest, transfer, and ongoing detention violate the First Amendment because they:

- retaliate against and punish Mr. Khalil for his past protected speech;
- prevent him from speaking now (through detention);
- attempt to chill (through past punishment and ongoing threat) or prevent (through eventual removal) his future speech in the United States;
- deprive audiences of his present and future speech on matters of public concern; and
- chill other individuals from expressing views sympathetic to Palestinians.

90. These speech-related consequences are not side effects of an action with some other purpose; they are, instead, the point of the Determination and the government's subsequent actions against Mr. Khalil and are, in government officials' own telling, the result of their disagreement with his protected speech and the viewpoint it expresses.

SECOND CLAIM
Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution

91. Petitioner repeats and re-alleges the allegations contained in the preceding paragraphs of this Complaint-Petition as if fully set forth herein.

92. The Constitution establishes due process rights for "all 'persons'

within the United States, including [noncitizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Black v. Decker*, 103 F.4th 133, 143 (2d Cir. 2024) (quoting *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001)).

93. The government's detention of Mr. Khalil is wholly unjustified. *See Black*, F.4th at 157 (collecting cases stating that "[w]here an individual's liberty is at stake, the Supreme Court has consistently required the government to justify continued detention by clear and convincing evidence."). The government has not demonstrated that Mr. Khalil—a husband to a U.S. citizen, soon-to-be father to a U.S. citizen, and lawful permanent resident with no criminal history—needs to be detained. *See Zadvydas*, 533 U.S. at 690 (finding immigration detention must further the twin goals of (1) ensuring the noncitizen's appearance during removal proceedings and (2) preventing danger to the community). There is no credible argument that Mr. Khalil cannot be safely released back to his family.

94. Moreover, Mr. Khalil's detention is punitive as it bears no "reasonable relation" to any legitimate government purpose. *Zadvydas*, 533 U.S. at 690 (finding immigration detention is civil and thus ostensibly "nonpunitive in purpose and effect"). The sole basis of his detention—the Foreign Policy Ground and the Rubio Determination—are unlawful for the reasons discussed *supra*. Here, there is every indication that his "detention is not to facilitate deportation, or to protect against risk of flight or dangerousness, but to incarcerate for other reasons." *Demore v. Kim*, 538 U.S. 510, 532-33 (2003) (Kennedy, J., concurring).

95. The Policy and the Rubio Determination also violate Mr. Khalil's right to due process. The government's policy of Foreign Policy Ground making such

determinations concerning people like Mr. Khalil—lawful permanent residents, living peacefully in the country who engage in speech advocating for Palestinian rights—is unconstitutionally vague.

THIRD CLAIM

Violation of the Administrative Procedure Act and the *Accardi* Doctrine

96. Petitioner repeats and re-alleges the allegations contained in the preceding paragraphs of this Complaint-Petition as if fully set forth herein. The government has adopted a policy of targeting noncitizens for removal based on First Amendment protected speech advocating for Palestinian rights. This policy is arbitrary and capricious, an abuse of discretion, contrary to constitutional right, contrary to law, and in excess of statutory jurisdiction. 5 U.S.C.A. § 706 (2)(A), (B), (C), and violates the *Accardi* doctrine and federal agencies' own rules, *see Accardi v. Shaughnessy*, 347 U.S. 260 (1954). In addition, the Secretary of State's determination that Mr. Khalil's "presence or activities would potentially have serious adverse foreign policy consequences for the United States" and "would compromise a compelling United States foreign policy interest" is arbitrary and capricious, an abuse of discretion, contrary to constitutional right, contrary to law, and in excess of statutory jurisdiction. 5 U.S.C.A. § 706 (2)(A), (B), (C).

FOURTH CLAIM

Release on Bail Pending Adjudication

97. Petitioner repeats and re-alleges the allegations contained in the preceding paragraphs of this Complaint-Petition as if fully set forth herein.

98. This Court has the "inherent authority" to grant bail to habeas petitioners

like Mr. Khalil. *See Mapp v. Reno*, 241 F.3d 221, 230 (2d Cir. 2001) (holding that federal courts have inherent authority to set bail pending the adjudication of a habeas petition when the petition has raised substantial claims and extraordinary circumstances "make the grant of bail necessary to make the habeas remedy effective"). In considering a petitioner's fitness for bail, courts assess (1) "whether the petition raises substantial claims" and (2) "whether extraordinary circumstances exist that make the grant of bail necessary to make the remedy effective." *Elkimya v. Dep't of Homeland Sec.*, 484 F.3d 151, 154 (2d Cir. 2007) (cleaned up).

99. This petition raises numerous substantial constitutional and statutory claims challenging Mr. Khalil's retaliatory detention. As for the second factor, extraordinary circumstances exist here that make Mr. Khalil's release necessary to make the remedy effective. As long as Mr. Khalil remains in ICE custody, he will be prevented from speaking freely and openly—instead, his speech is severely curtailed and controlled by DHS. And it is effectively impossible for him to speak to the broader public at all. His detention is also preventing him from adequately litigating his removal proceedings, which the government has chosen to justify only in the press. Moreover, Mr. Khalil's wife is eight months pregnant with their first child. Not only is she unable to visit him where ICE has chosen to detain him, in Louisiana, but his continued detention prevents him from caring for her at a critical time and will cause him to miss the birth of his first child. *See, e.g.*, *S.N.C. v. Sessions*, No. 18-CV-7680, 2018 WL 6175902, at *6 (S.D.N.Y. Nov. 26, 2018) (ordering immediate release of petitioner pending consideration of her claim that her abrupt deportation would violate her due process right to an opportunity to be heard on her application and in order to care for her children).

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1) Assume jurisdiction over this matter;

2) Vacate and set aside Respondents' unlawful Policy of targeting noncitizens for removal based on First Amendment protected speech advocating for Palestinian rights;

3) Vacate and set aside the Rubio Determination;

4) Enjoin Respondents from transferring the Petitioner from the jurisdiction of this District pending these proceedings;

5) Order the immediate release of Petitioner pending these proceedings;

6) Order the release of Petitioner;

7) Declare that Respondents' actions to arrest and detain Petitioner violate the First Amendment and the Due Process Clause of the Fifth Amendment;

8) Award reasonable attorneys' fees and costs for this action; and

9) Grant such further relief as the Court deems just and proper.

Dated: March 13, 2025
New York, New York

/s/ *Amy Belsher*
Amy Belsher
Robert Hodgson
Veronica Salama
Molly Biklen
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor

New York, N.Y. 10004
Tel: (212) 607-3300
abelsher@nyclu.org

Counsel for Petitioner

Omar Jadwat
Noor Zafar
Sidra Mahfooz*
Brian Hauss
Brett Max Kaufman
Esha Bhandari
Vera Eidelman
Tyler Takemoto*
American Civil Liberties Union Foundation
125 Broad Street, Floor 18
New York, NY 10004
ojadwat@aclu.org

**Application for admission* pro hac vice *forthcoming*

CLEAR PROJECT
MAIN STREET LEGAL SERVICES, INC.

Ramzi Kassem
Naz Ahmad
Shezza Abboushi Dallal
CUNY School of Law
2 Court Square
Long Island City, NY 11101
(718) 340-4558
ramzi.kassem@law.cuny.edu
naz.ahmad@law.cuny.edu
shezza.dallal@law.cuny.edu
CENTER FOR CONSTITUTIONAL RIGHTS

Baher Azmy
Samah Sisay
Diala Shamas
666 Broadway, 7th Floor
New York, NY 10012
(212) 614-6436
bazmy@ccrjustice.org
ssisay@ccrjustice.org
dshamas@ccrjustice.org

DRATEL & LEWIS

Amy E. Greer
29 Broadway, Suite 1412
New York, NY 10006
Phone:(212)732-8805
Fax: (212) 571-3792
Email: agreer@dratellewis.com