

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BADAR KHAN SURI)	
)	
Petitioner,)	
)	Civil Action No. 1:25-cv-480
v.)	
)	
DONALD J. TRUMP, <i>et al.</i> ,)	
)	
)	
Respondents.)	
)	

DECLARATION OF YOUSUF KHAN

I, Yousuf Khan, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an Assistant Field Office Director (“AFOD”) in the Dallas, Texas Field Office of Enforcement and Removal Operations at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”).

2. As the AFOD, I am responsible for the detained and detention portfolios, meaning I am responsible for the officers that process incoming detainees, manage the immigration cases of detainees, and oversee the detention facilities in the field office to ensure compliance with relevant standards.

3. I am aware that Badar Khan Suri (“Suri”) has filed a Petition for a Writ for Habeas Corpus before this Court.

4. I provide this declaration based on my personal knowledge, reasonable inquiry, and information obtained from various records, systems, databases, and other DHS employees, and information portals maintained and relied upon by DHS in the regular course of

business.

5. Suri is an alien who is detained by ICE at the Prairieland Detention Facility (“PDF”), 1209 Sunflower Lane, Alvarado, Texas 76009.
6. The PDF permits legal representatives to visit their clients in-person, telephonically, and virtually. In-person visits are conducted in a confidential setting without prior arrangement on weekdays, Monday to Friday, from 8:00 a.m. to 5:00 p.m. Central Daylight Time. Visits on weekends or holidays must be scheduled ahead of time.
7. Generally, legal representatives can utilize the Virtual Attorney Visitation (“VAV”) which allows legal representatives to meet with their clients, virtually, using unrecorded video technology in confidential private rooms to ensure confidentiality of communications during remote legal visits. Both VAV and telephone calls are available to legal representatives and detainees through appointments, reserved in 45-minute blocks, and scheduled 24 hours in advance. Appointments are scheduled between the hours of 8:00 a.m. to 5:00 p.m. Central Daylight Time. VAV and telephone calls are generally limited to one per day for each detainee. If open slots are available, the VAV appointments will be extended to accommodate longer meetings if requested.
8. Generally, confidential electronic exchange of legal documents is permitted when timely communication through mail is not possible. There is a procedure in place to request to be allowed electronic exchange.
9. The PDF permits Suri to communicate telephonically and virtually with family and friends. Detainees have access to telephones and tablets. The telephones can be used to make unmonitored calls to court, to legal counsel, or to obtain legal counsel, as well as non-confidential telephone calls to others. To make confidential calls, detainees request,

via tablets or paper, they are then brought to private booths to make unmonitored calls. The tablets can be used to conduct non-confidential video calls between the hours of 8:00 AM and 12:00 AM.

10. More information on visitations is located on the ICE website at: <https://www.ice.gov/detain/detention-facilities/prairieland-detention-facility>.
11. At the PDF, ERO can arrange to produce Suri virtually via WebEx for matters before the Executive Office for Immigration Review Port Isabel Immigration Court, or if necessary, Microsoft Teams, for an appearance in federal court.
12. Per the Court's order enjoining his removal, Suri will not be removed from the United States so long as the Court's order is valid and operative.
13. Per Suri's Notice to Appear, he is scheduled for a hearing in his immigration proceedings at Port Isabel Immigration Court on May 6, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April 2025.



Yousuf Khan
Assistant Field Office Director
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security