

**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 providing the following declaration in support of the Government’s Opposition to Petitioner’s, Badar Khan Suri (“Suri”), Motion for Release on Bond. The information in this declaration is based upon 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.

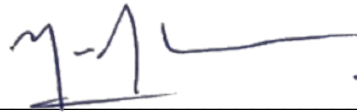
4. Suri is an alien who is detained by ICE at the Prairieland Detention Facility (“PDF”), 1209 Sunflower Lane, Alvarado, Texas 76009. PDF is structured with multiple housing dorms. Each dorm has approximately 45 detainees who sleep in grouped bunkbeds. Each dorm has its own bathroom and leisure facilities.
5. From March 22, 2025, to April 2, 2025, Suri was provided a temporary arrangement of a sleeping mat and movable plastic cot. For the first two nights, the cot was placed in the common room, attached to the housing dorm with the television, and then it moved to the main dorm. Immediately upon becoming available, Suri was then moved to a permanent bunk in the housing unit. He is currently on a top bunk and was told he can move to a bottom bunk when it is available.
6. Suri is provided clothing that is standard for detainees at PDF. Suri is provided with a red shirt and blue pants, similar to medical scrubs, with, white socks, and orange sandals.
7. Suri is not being prevented from practicing his faith. When Suri arrived at PDF, during the month of Ramadan, he stated he was fasting during transport to PDF but since the sun had set by the time of his arrival, he needed to break his fast and eat. Suri requested food to break his fast, which was immediately provided. He was provided a sandwich and some apple at intake. The Chaplain at PDF is working to accommodate Suri’s requests so that he can practice his faith. Specifically, the Chaplain is coordinating Halal meals with the local Imam at Hurst, TX.
8. Suri was provided a copy of the Quran upon his arrival when he requested it. Suri then requested a specific non-Arabic version of the Quran. The Chaplain is working to get the specific Quran and a prayer mat. Suri was informed that a soft backed, or paperback,

version of the Quran could be sent to him from outside the facility if he wished.

9. Suri was provided the name of the ICE officer managing his detention, DO Michael Thompson, and instructions on how to contact him via facility tablet. Suri made his first request to speak with DO Thompson, on April 2, 2025. Suri has been told he can also make requests to DO Thompson if he feels facility staff have not been sufficiently responsive. He has met DO Thompson and Acting Supervisory Detention and Deportation Officer Erich Klein, who is also involved in managing his detention, in person and is familiar with them.

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

Executed this 3rd day of April 2025.



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