

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

BADAR KHAN SURI

Petitioner,

V.

DONALD J. TRUMP, *et al.*,

Civil Action No. 1:25-cv-480

Respondents.

)

)

)

)

## DECLARATION OF JOSEPH SIMON

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

1. I am a Deputy Field Office Director (“DFOD”) in Chantilly, Virginia Field Office of Enforcement and Removal Operations (“ERO Virginia”) at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”). I have been employed with ERO since September 2009 as an Immigration Enforcement Agent. In September 2012, I was promoted to Deportation Officer. In March 2020, I was promoted to Assistant Field Office Director. In October 2022, I was promoted to my current role as DFOD.
2. The following declaration is a supplement to my prior April 1, 2025, declaration.
3. Based on DHS internal databases, Suri was booked into the Alexandria Staging Facility (“ASF”) at 5:42 PM on March 18, 2025. He was booked out of the ASF at 8:31 AM on March 21, 2025. Suri was then booked into the Prairieland Detention Center at 6:32 PM the same day.
4. Assistant Field Office Director (“AFOD”) Ragan Lewis is the officer in charge of the ASF.

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

Executed this 21st day of April 2025.

---

Joseph Simon  
Deputy Field Office Director  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement  
U.S. Department of Homeland Security