

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAHMOUD KHALIL,

Petitioner,

v.

WILLIAM P. JOYCE, *et al.*,

Respondents.

No. 25 Civ. 1935 (JMF)

SUPPLEMENTAL DECLARATION OF ACTING
FIELD OFFICE DIRECTOR WILLIAM P.
JOYCE

SUPPLEMENTAL DECLARATION OF WILLIAM P. JOYCE

I, WILLIAM P. JOYCE, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an Acting Field Office Director (“(A)FOD”) in the New York City Field Office of Enforcement and Removal Operations (“ERO New York”) at U.S. Immigration and Customs Enforcement (“ICE”) within the U.S. Department of Homeland Security (“DHS”).

2. I executed a declaration in this case on March 12, 2025, which was filed on March 12, 2025, in support of Respondents’ Motion to Dismiss or Transfer (ECF No. 32).

3. I submit this supplemental declaration to clarify and correct a statement I made in my March 12 declaration. Specifically, in the first sentence of paragraph 7 of that declaration, I stated: “On March 8, 2025, Special Agents from the ICE Homeland Security Investigations (“HSI”) Office of the Special Agent in Charge for the New York Area of Responsibility (“AOR”) arrested Khalil at 8:35 p.m. in front of [REDACTED], for the purpose of placing him in removal proceedings.”

4. I amend that first sentence of paragraph 7 as follows: On March 8, 2025, Special

Agents from the ICE Homeland Security Investigations (“HSI”) Office of the Special Agent in Charge for the New York Area of Responsibility (“AOR”) observed Khalil outside of [REDACTED] [REDACTED] at approximately 8:32 p.m. and arrested Khalil in the front foyer of [REDACTED] at approximately 8:35 p.m., for the purpose of placing him in removal proceedings.

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

Executed this 13th day of March 2025.

**WILLIAM P
JOYCE**



Digitally signed by WILLIAM P JOYCE
DN: cn=WILLIAM P JOYCE, o=U.S.
Government, ou=People,
email=William.P.Joyce@ice.dhs.gov, c=US
Date: 2025-03-13T17:43:38-0400

William P. Joyce
Acting Field Office Director
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
U.S. Department of Homeland Security