July 1, 2025 Addendum to June 24, 2025 Protected Whistleblower Disclosure of Mr. Erez Reuveni Submitted Pursuant to 5 U.S.C. § 2302 and 5 U.S.C. § 1213

EXHIBIT NUMBER	DESCRIPTION	PAGE NUMBER
1	March 15, 2025 Text messages between Mr. Reuveni and Flentje	Pages 1-2
	This text exchange in the context of the JGG hearing and the March 15 removal flights demonstrates that Flentje knew about Bove's "fuck you" comment and understood it to mean the DOJ might ignore a court order.	
2	March 15-16, 2025 phone records of Mr. Reuveni	Pages 3-8
	Demonstrates multiple phone calls Mr. Reuveni had related to AEA litigation on March 15-16.	
3	March 15, 2025 Emails between Mr. Reuveni and the AEA Litigation team	Pages 9-13
	These emails were referenced in the June 24, 2025 disclosure regarding Judge Boasberg's order to halt removals in JGG v. Trump. In this set Mr. Reuveni communicates the instruction of Judge Boasberg's order.	
4	March 15, 2025 Emails between Mr. Reuveni and the AEA Litigation team	Page 14- 22
	These emails were referenced in the June 24, 2025 disclosure regarding Judge Boasberg's order to halt removals in JGG v. Trump. In this set of emails Mr. Reuveni asks for confirmation that the government is not in contempt of Judge Boasberg's order.	
5	March 15-16, 2025 Emails between Mr. Reuveni and the AEA Litigation team	Pages 23-25
	These emails were referenced in the June 24, 2025 disclosure regarding Judge Boasberg's order to halt removals in JGG v. Trump. This set of emails demonstrates that Mr. Reuveni repeatedly asked for confirmation that the government was not in contempt of Judge Boasberg's order without response.	

6	March 16, 2025 Email from Yaakov Roth to Mr. Reuveni and Mr. Flentje	Pages 26-27
	Regarding principal associate deputy attorney general advising DHS that deplaning flights outside of US airspace prior to Judge Boasberg's minute order was permissible.	
7	March 19, 2025 Text messages between Mr. Reuveni and Flentje	Pages 28-29
	This text exchange occurred in the context of filing a brief on March 19 asking to stay Judge Boasberg's March 18 minute order in JGG v. Trump and demonstrates reference to Bove's "fuck you" comment.	
8	March 27, 2025 – April 2, 2025 Emails between Mr. Reuveni and others regarding the case of Mr. Abrego Garcia	Page 30-73
	This email exchange demonstrates unsuccessful efforts to address the lack of evidence that Mr. Abrego Garcia was a member of MS-13.	
	P. 38 An email from James Percival states the following:	
	"Can we say the following?: 1. This guy is a leader of MS-13 2. His removal was due to a good faith	
	<i>administrative error</i> <i>3. We do not believe he is in immediate danger</i>	
	4. We are engaged in multiagency discussions 5. Any judicial intrusion is likely to make any subsequent	
	diplomatic discussions with El Sal less successful"	
9	April 1, 2025 Text messages between Mr. Reuveni and Flentje	Pages 74-75
	Messages demonstrate report Mr. Reuveni made to Flentje about the message Mr. Reuveni received from Roth that Bove was upset at Mr. Reuveni. The reason for Bove's displeasure was that Mr. Reuveni was contacting DOD, DHS, and DOS regarding the apparent violation of the injunction in DVD v. DHS in writing.	

		l
10	April 2, 2025 Email with OIL attorneys and others regarding Plaintiff's allegations of violation of injunction in <i>DVD v</i> . <i>DHS</i> <i>P. 77 April 4, 8:57 P.M. email from DHS Acting</i>	Pages 76-79
	General Counsel Mazzara: "As to the operations referenced by Secretary Rubio, DHS was not involved in those operations."	
11	April 5, 2025 Text messages between Mr. Reuveni and Flentje	Pages 80-81
	These messages were sent following Mr. Reuveni's placement on administrative leave after the April 4, 2025 hearing in the case of Mr. Abrego Garcia before Judge Xinis. The exchange demonstrates that Flentje was at the March 14 meeting during which Bove said the government might have to say "fuck you" to courts and that Flentje sees a connection between that meeting and Mr. Reuveni's placement on administrative leave	
	P. 81 Text from Flentje on April 5 at 2:46 P.M.: "I believe I told our host we would not violate a court order. I think there is definitely a through line from that meeting to where we are today."	
12	April 5, 2025 10:36 A.M. Notice of Administrative Leave <i>Email from Human Resources Director F. Michael</i> <i>Sena with attached letter from Deputy Attorney</i> <i>General Todd Blanche notifying Mr. Reuveni that he</i> <i>was being placed on administrative leave for,</i> <i>"failure to follow a directive from your superiors;</i> <i>failure to zealously advocate on behalf of the United</i> <i>States; and engaging in conduct prejudicial to your</i> <i>client."</i>	Pages 82-83
13	April 11, 2025 3:57 P.M. Memorandum for Erez Reuveni	Pages 84-85
	<i>Email from Human Resources Director F. Michael</i> <i>Sena with attached Official Notice of removal from</i>	

	position as supervisory trial attorney from the Deputy Attorney General Todd Blanche.	
14	March 17, 2025 – April 5, 2025 phone records of Mr. Reuveni	Pages 86-95
	Supports June 24, 2025 disclosure by demonstrating phone calls referenced	

3/15/25, 6:44 PM

guess its find out time on the "fuck you"

Yup. It was good working with you.

the first el sal flight lands in an hour

so says flightaware

Well maybe they land and drop off all the title 3 people.

3/16/25, 9:31 AM

Check your email. Email from dhs

3/16/25, 4:05 PM

axios.com

We are likely saved for today by the fact that Boasberg is on vacation. 2





KEYLINE Indillindhaandilindadadhaandidadadhaa

EREZ REUVENI

(details on page 3)		
0		

If you don't pay the total charges due by the due date, you'll be charged 5% of the unpaid balance or \$7, whichever is greater, if allowed by law in the state of your billing address.



Billing period: Feb 17 - Mar 16, 2025

Questions about your bill? verizon.com/support 800-922-0204

Ways to pay

My Verizon app

You can check your bill easily with the My Verizon app available in App Store or Google Play.



Go to go.vzw.com/bill and sign in to review your bill.

C By phone

Simply dial #PMT (#768) on your phone and follow the instructions to pay.



Go to www.verizon.com/stores to find a Verizon Wireless store near you or find a Check Free Pay or Western Union near you to make a cash payment.



Please see back for instructions on writing to us.

P.O. BOX 15062 ALBANY, NY 12212-5062

հավեսեկակեսկեներինումիուների



Billing period: Feb 17 - Mar 16, 2025

Talk activity (cont.)

Erez Reuveni

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
							_ ,	
					-i			1
					ī			ī
					1			
								I-
Mar 14	6:00 PM	7275	Bethesda, MD	New York, NY	16			
Mar 15	8:17 AM	7275	Bethesda, MD	Incoming, CL	12			
Mar 15	9:09 AM	7275	Bethesda, MD	New York, NY	1			
Mar 15	9:12 AM	7275	Bethesda, MD	Incoming, CL	3			
Mar 15	9:17 AM	5585	Bethesda, MD	Nwyrcyzn01, NY	2			
Mar 15	9:41 AM	5585	Bethesda, MD	Incoming, CL	1			
Mar 15	9:47 AM	7275	Bethesda, MD	Incoming, CL	6			
Mar 15	9:52 AM	7275	Bethesda, MD	Incoming, CL	1			
Mar 15	10:27 AM	7275	Bethesda, MD	Incoming, CL	8			
Mar 15	10:35 AM	9643	Bethesda, MD	Washington, DC	1			
Mar 15	10:37 AM	9643	Bethesda, MD	Incoming, CL	3			
Mar 15	10:41 AM	7275	Bethesda, MD	Incoming, CL	4			
Mar 15	10:52 AM	7275	Bethesda, MD	New York, NY	5			
Mai 15	10:52 AIVI	1213	Bethesda, MD	New FOIK, NT	5			
Mar 15	11:16 AM	7275	Bethesda, MD	Incoming, CL	3			
Mar 15	11:21 AM	9643	Bethesda, MD	Washington, DC	2			
Mar 15	11:23 AM	7275	Bethesda, MD	Incoming, CL	7			
Mar 15	11:29 AM	9643	Bethesda, MD	Washington, DC	6			
Mar 15	11:36 AM	7275	Bethesda, MD	Incoming, CL	2			
Mar 15	11:39 AM	7275	Bethesda, MD	Incoming, CL	5			
Mar 15	11:57 AM	7275	Bethesda, MD	Incoming, CL	4			
					1			
Mar 15	12:15 PM	7275	Bethesda, MD	Incoming, CL	3			
Mar 15	12:22 PM	7275	Bethesda, MD	Incoming, CL	1			
Mar 15	12:28 PM		Bethesda, MD	Incoming, CL	5			
Mar 15	12:45 PM		Bethesda, MD	Incoming, CL	1			
Mar 15	12:46 PM	5585	Bethesda, MD	Nwyrcyzn01, NY	1			
Mar 15	12:48 PM	7275	Bethesda, MD	New York, NY	1			

6



Billing period: Feb 17 - Mar 16, 2025

Talk activity (cont.)

Erez Reuveni

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
4 15								
1ar 15	1:02 PM	9643	Bethesda, MD	Washington, DC	2			
4. 45		2075						
1ar 15	1:16 PM	7275	Bethesda, MD	Incoming, CL	3			
1ar 15	1:28 PM	7275	Bethesda, MD	Incoming, CL	1			
1ar 15	2:05 PM	7275	Bethesda, MD	Incoming, CL	1			
1ar 15	2:17 PM	7275	Bethesda, MD	Incoming, CL	2			
1ar 15	2:30 PM	7275	Bethesda, MD	Incoming, CL	2			
1ar 15	2:45 PM	7275	Bethesda, MD	Incoming, CL	1			
1ar 15	3:03 PM	7275	Bethesda, MD	Incoming, CL	5	_		
4. 45	0.00 PM	2075						
1ar 15	3:29 PM	7275	Bethesda, MD	Incoming, CL	5			
4. 45	4.44 DM	2075						
1ar 15	4:11 PM	7275	Bethesda, MD	Incoming, CL	7			
1ar 15	4:26 PM	7275	Bethesda, MD	Incoming, CL	2			
1ar 15	4:42 PM	7275	Bethesda, MD	Incoming, CL	2			
1ar 15	5:30 PM	7275	Bethesda, MD	Incoming, CL	6			
1ar 15	5:41 PM	7275	Bethesda, MD	Incoming, CL	6			
								_
								_
4 45	0.50 PM							
1ar 15	6:53 PM	9643	Bethesda, MD	Incoming, CL	3			
4	7.00 DM	7075	Dette sete MD					
1ar 15	7:08 PM	7275	Bethesda, MD	Incoming, CL	6			
1ar 15	7:30 PM	7275	Rockville, MD	Incoming, CL	1			
lar 15	7:59 PM	7275	Rockville, MD	Incoming, CL	4			
1	0.00 PM	00.40	Dette sede MD)A/a a him arta m DO				
lar 15	8:30 PM	9643	Bethesda, MD	Washington, DC	5			
								_
len 1C	0.40 PM	7075	Dethecele MD	New Yerk NY				
1ar 15	8:43 PM	7275	Bethesda, MD	New York, NY	1			
1ar 15	8:46 PM		Bethesda, MD	Incoming, CL	6			
lar 15	8:52 PM	9643	Bethesda, MD	Washington, DC	7			
lar 15	8:54 PM	7275	Bethesda, MD	Incoming, CL	8			
1 45	0.00 5	2075	Dath as 1, MD					
1ar 15	9:39 PM	7275	Bethesda, MD	Incoming, CL	3			
1ar 15	9:44 PM		Bethesda, MD	Incoming, CL	2			
lar 15	9:47 PM	7275	Bethesda, MD	Incoming, CL	2			
/ar 15	10:00 PM	7275	Bethesda, MD	Incoming, CL	2			



Billing period: Feb 17 - Mar 16, 2025

Talk activity (cont.)

Erez Reuveni

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
Mar 15	10:13 PM	7275	Bethesda, MD	Incoming, CL	1			
Mar 15	10:34 PM	7275	Bethesda, MD	Incoming, CL	2			
Mar 15	10:50 PM	7275	Bethesda, MD	New York, NY	4			
Mar 15	11:57 PM	7275	Bethesda, MD	Incoming, CL	1			
Mar 15	11:57 PM	7275	Bethesda, MD	Incoming, CL	3			
Mar 16	12:00 AM		Bethesda, MD	Incoming, CL	1			
Mar 16	12:00 AM	7275	Bethesda, MD	Incoming, CL	1			
Mar 16	12:23 AM		Bethesda, MD	Incoming, CL	3			
Mar 16	12:55 AM	7275	Bethesda, MD	Incoming, CL	2			
					_			
Mar 16	9:32 AM	9643	Bethesda, MD	Washington, DC	5			
Mar 16	9:33 AM		Bethesda, MD	Wshngtnzn1, DC	4			
Mar 16	9:37 AM	9643	Bethesda, MD	Washington, DC	5			
Man 46	40.00 414	7075	Dette sede MD	Name Marcha MIX				
Mar 16	10:30 AM		Bethesda, MD	New York, NY	1 2			
Mar 16	10:32 AM	7275	Bethesda, MD	New York, NY	2			
Mar 16	11:24 AM	7275	Wheaton, MD	Incoming, CL	15			
Mai 10	TI:24 AIVI	1213	wheaton, MD	incoming, CL	15			
					-			
Mar 16	2:53 PM	7275	Bethesda, MD	Incoming, CL	1			
	2.001 M	1210	Detheoda, MD	interning, etc				
Mar 16	3:04 PM	7275	Bethesda, MD	New York, NY	4			
Mar 16	3:30 PM		Bethesda, MD	Incoming, CL	7			

From:	Reuveni, Erez R. (CIV)
То:	; (<u>CIV</u>); (<u>CIV</u>); ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ; ;
	8 8 8 8 8 7 7
Cc:	Flentje, August (CIV); (CIV); (CIV);
Subject:	RE: AEA Litigation Team - case updates
Date:	Saturday, March 15, 2025 7:04:08 PM

As we await the written order, clarifying our understanding of the injunction as clarified at the end. No one subject to AEA in our custody can be removed. And anyone in the air should be returned, unless they have a title 8 final order. Please confirm receipt and let us know what if anything is happening. Thank you.



Subject: RE: AEA Litigation Team - case updates

Sorry for all the emails. Last email: the judge specifically ordered us to not remove anyone in the class, and to return anyone in the air.

From: Reuveni, Erez R. (CIV)

Sent: Saturday, March 15, 2025 6:46 PM

То:	<u>Vice.dhs.gov</u> >;
@usdoj.gov>;	@usdoj.gov>;
@state.gov>;	@state.gov>;
	@ice.dhs.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@ice.dhs.gov>;
@ice.dhs.gov>;	<u>@HQ.DHS.GOV</u> >;
@HQ.DHS.GOV>;	@hq.dhs.gov>
Cc: Flentje, August (CIV) < <u>August.Flentje@u</u>	<u>usdoj.gov</u> >;
@usdoj.gov>;	@usdoj.gov>;
@usdoj.gov>;	@usdoj.gov>;
@usdoi.gov>	

Subject: RE: AEA Litigation Team - case updates

The class is "all noncitizens in US custody subject to the AEA" a minute order with more specifics will issue. Please confirm receipt of this email and let us know ASAP on the questions below concerning removals not yet effectuated, including those involving folks in the air.

From: Reuveni, Erez R. (CIV)

To:

Sent: Saturday, March 15, 2025 6:44 PM

<u>@ice.dhs.gov</u>>;

@usdoj.gov>;	@usdoj.gov>;
@state.gov>;	@state.gov>;
	@ice.dhs.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@ice.dhs.gov>;
@ice.dhs.gov>;	@HQ.DHS.GOV>;
@HQ.DHS.GOV>;	@hq.dhs.gov>
Cc: Flentje, August (CIV) < <u>August.Flentje@us</u>	sdoj.gov>;
@usdoj.gov>;	<u>@usdoj.gov</u> >;
@usdoj.gov>;	@usdoj.gov>;
@usdoj.gov>	

Subject: RE: AEA Litigation Team - case updates

Importance: High

The judge is presently issuing a class-wide TRO.

Can folks confirm for us if at the moment any individuals subject to the AEA are being staged for removal, or are presently in the air as part of removal (but not yet having landed and disembarked)?

From:	Reuveni,	Erez	R.	(CIV)
	near crin,			(,

Sent: Saturday, March 15, 2025 6:14 PM

<u>@ice.dhs.gov</u> >;
@usdoj.gov>;
@state.gov>;
@ice.dhs.gov>;
@state.gov>;
@state.gov>;
@ice.dhs.gov>;
<u>@HQ.DHS.GOV</u> >;
@hq.dhs.gov>
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>;

Subject: RE: AEA Litigation Team - case updates

Judge is certifying a nationwide class as we speak. It is likely a class-wide tro is imminent.

From: @ice.dhs.gov>

Sent: Saturday, March 15, 2025 6:09 PM

To: Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>;

@usdoj.gov>;	@usdoj.gov>;
@state.gov>;	@state.gov>;
	@ice.dhs.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@ice.dhs.gov>;
@ice.dhs.gov>;	@HQ.DHS.GOV>;
@HQ.DHS.GOV>;	@hq.dhs.gov>

Cc: Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>>;

@usdoj.gov>;	<u>@usdoj.gov</u> >;
@usdoj.gov>;	@usdoj.gov>;
@usdoj.gov>;	@ice.dhs.gov>
Subject: [EXTERNAL] RE: AFA Litigation Team - case undates	

Subject: [EXTERNAL] RE: AEA Litigation Team - case updates

<u>Thanks.</u>	Sorry	to	nudge.	

U.S. Immigration and Customs Enforcement

** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).

From: Reuveni, Erez R. (CIV) < <u>Erez.R.Reuveni@usdoj.gov</u>>

Sent: Saturday, March 15, 2025 6:08 PM

То:	@ice.dhs.gov>;
@usdoj.gov>;	@usdoj.gov>;
@state.gov>;	<pre>@state.gov>;</pre>
	@ice.dhs.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@ice.dhs.gov>;
@ice.dhs.gov>;	@HQ.DHS.GOV>;
@HQ.DHS.GOV>;	@hq.dhs.gov>
Cc: Flentje, August (CIV) < <u>August.Flentje</u>	
@usdoj.gov>;	@usdoj.gov>;
@usdoj.gov>;	@usdoj.gov>;
@usdoj.gov>	undator
Subject: RE: AEA Litigation Team - case u	of DHS. DO NOT click links or open attachments unless you recognize
	e Report Phishing button to report. If the button is not present, click
here and follow instructions.	
The hearing took a break to get further inf	ormation and is back in session now. Update shortly.
From:	@ice.dhs.gov>
Sent: Saturday, March 15, 2025 6:06 PM	
То:	@usdoj.gov>;
@usdoj.gov>;	@state.gov>;
@state.gov>;	
@ice.dhs.gov>;	@state.gov>;
@state.gov>;	@state.gov>; @state.gov>;
@state.gov>	
	<u>@ice.dhs.gov</u> >;
@HQ.DHS.GOV>;	<u>@HQ.DHS.GOV</u> >;



Cc: Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>; Flentje, August (CIV)



From:	Reuveni, Erez R. (CIV)
То:	; (<u>(CIV)</u> ; <u>(CIV)</u> ; ;
Cc:	Flentje, August (CIV); (CIV); (CIV); (CIV); (CIV); (CIV);
Subject:	Re: AEA Litigation Team - case updates
Date:	Saturday, March 15, 2025 7:27:25 PM

Here is the minute order.

MINUTE ORDER: As discussed in today's hearing, the Court ORDERS that: 1) Plaintiffs' [4] Motion for Class Certification is GRANTED insofar as a class consisting of "All noncitizens in U.S. custody who are subject to the March 15, 2025, Presidential Proclamation entitled 'Invocation of the Alien Enemies Act Regarding the Invasion of The United States by Tren De Aragua' and its implementation" is provisionally certified; 2) The Government is ENJOINED from removing members of such class (not otherwise subject to removal) pursuant to the Proclamation for 14 days or until further Order of the Court; 3) The Government shall file any Motion to Vacate this TRO by March 17, 2025, with Plaintiffs' Opposition due by March 19, 2025; and 4) The hearing set for March 17, 2025, is VACATED and RESET for March 21, 2025, at 2:30 p.m. via Zoom. So ORDERED by Chief Judge James E. Boasberg on 3/15/2025. (Icjeb1)

Sent from my iPhone

On Mar 15, 2025, at 7:18 PM, Reuveni, Erez R. (CIV) wrote:

All plaintiffs have reached out about the flights. Please confirm asap no one lacking a title 8 final order will be taken off these planes when they land. We need to address this asap to avoid contempt. It in particular the flight landing in three minutes. Please advise.

- GXA flight 6143 does not appear to land until 7:20 pm eastern.
- GXA flight 6145 has about at least another hour in flight.
- GXA flight 6122 has not yet left Harlingen.
- •

Sent from my iPhone

On Mar 15, 2025, at 6:53 PM, Reuveni, Erez R. (CIV) wrote:

Thanks. And the two flights in the air?

From:





Subject: [EXTERNAL] RE: AEA Litigation Team - case updates Just confirmed on the ground that the Title 50 folks on the third flight are being pulled off.

Best,



U.S. Immigration and Customs Enforcement

*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).





Subject: RE: AEA Litigation Team - case updates

Two flights departed at about 5:15 and 5:45. They are still in the air.





*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).

From: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdoj.gov>

Sent: Saturday, March 15, 2025 6:48 PM



<u>@usdoj.gov</u>>

Subject: RE: AEA Litigation Team - case updates

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Sorry for all the emails. Last email: the judge specifically ordered us to not remove anyone in the class, and to return anyone in the air.

From: Reuveni, Erez R. (CIV)

Sent: Saturday, March 15, 2025 6:46 PM



Subject: RE: AEA Litigation Team - case updates

The class is "all noncitizens in US custody subject to the AEA" a minute order with more specifics will issue. Please confirm receipt of this email and let us know ASAP on the questions below concerning removals not yet effectuated, including those involving folks in the air.

From: Reuveni, Erez R. (CIV)

Sent: Saturday, March 15, 2025 6:44 PM



<u>@state.gov</u> >;
@state.gov>;
@state.gov>;
@ice.dhs.gov>;
@ice.dhs.gov>;
@HQ.DHS.GOV>;
@HQ.DHS.GOV>;
@hq.dhs.gov>
Cc: Flentje, August (CIV) < <u>August.Flentje@usdoj.gov</u> >;
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>

Subject: RE: AEA Litigation Team - case updates

Importance: High

The judge is presently issuing a class-wide TRO.

Can folks confirm for us if at the moment any individuals subject to the AEA are being staged for removal, or are presently in the air as part of removal (but not yet having landed and disembarked)?

From: Reuveni, Erez R. (CIV)





Subject: RE: AEA Litigation Team - case updates

tro is imminent. From: @ice.dhs.gov> Sent: Saturday, March 15, 2025 6:09 PM To: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdoj.gov>; @usdoj.gov>; @usdoj.gov>; @state.gov>; <u>@state.gov</u>>; @ice.dhs.gov>; @state.gov>; <u>@state.gov</u>>; @state.gov>; <u>@state.gov</u>>; @state.gov>; @ice.dhs.gov>; @ice.dhs.gov>; @HQ.DHS.GOV>; @HQ.DHS.GOV>; @hq.dhs.gov> Cc: Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>>; @usdoj.gov>; @usdoj.gov>; @usdoj.gov>; @usdoj.gov>; @usdoj.gov>; @ice.dhs.gov> Subject: [EXTERNAL] RE: AEA Litigation Team - case updates Thanks. Sorry to nudge. **U.S. Immigration and Customs Enforcement** *** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT *** This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7). From: Reuveni, Erez R. (CIV) < <u>Erez.R.Reuveni@usdoj.gov</u>>

Judge is certifying a nationwide class as we speak. It is likely a class-wide

notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE

Sent: Saturday, March 15, 2025 6:08 PM

To:

@ice.dhs.gov>;

@usdoj.gov>;
<u>@usdoj.gov</u> >;
@state.gov>; @state.gov>;
@ice.dhs.gov>; @state.gov>;
@state.gov>;
@state.gov>; @state.gov>;
@state.gov>;
@ice.dhs.gov>;
@ice.dhs.gov>;
@HQ.DHS.GOV>;
@HQ.DHS.GOV>;
@hq.dhs.gov>
Cc: Flentje, August (CIV) < <u>August.Flentje@usdoj.gov</u> >;
<u>@usdoj.gov</u> >;
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>;
@usdoj.gov>
Subject: RE: AEA Litigation Team - case updates
CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.
The hearing took a break to get further information and is back in session
now. Update shortly.
From: @ice.dhs.gov>
Sent: Saturday, March 15, 2025 6:06 PM
To: <u>@usdoj.gov</u> >;
@usdoj.gov>;
@state.gov>; @state.gov>;
@ice.dhs.gov>; @state.gov>;
@state.gov>;
@state.gov>; @state.gov>;
@state.gov>;
@ice.dhs.gov>;
@ice.dhs.gov>;
<u>@HQ.DHS.GOV</u> >;
<u>@HQ.DHS.GOV</u> >;
@hq.dhs.gov>
@hq.dhs.gov>



Subject: [EXTERNAL] RE: AEA Litigation Team - case updates Any word on the 5pm hearing?



U.S. Immigration and Customs Enforcement



*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5). (b)(7).

22

From: To:	Reuveni, Erez R. (CIV) ; (CIV); ;<
Cc:	i i i i Flentie, August (CIV); (CIV); (CIV); (CIV); (CIV);
Subject:	RE: AEA Litigation Team - case updates
Date:	Sunday, March 16, 2025 8:07:23 AM
Importance:	High

Good morning everyone. Thanks everyone for being on deck last night for the filings. We really appreciate the assist.

In the meantime, following up on several different emails including the below and merging into one place. Can we please get an update on the status of compliance with the injunction, consistent with the earlier emails and guidance from us below? Specifically, can you confirm the status of the three flights referenced below, and the status of the individuals that are on each of the flights? As a reminder our advice here on injunction compliance was to not deplane anyone from these planes who is subject to an AEA removal, although it was permissible to deplane individuals with Title 8 orders, and otherwise return those individuals to the United States. We need to confirm quickly status so we can update the court if necessary.

Relatedly, to the extent conversations on these issues are occurring at a higher level within your leadership and ours, can you please confirm that?

Many thanks, Erez

From: Reuveni, Erez R. (CIV)



Subject: Re: AEA Litigation Team - case updates

All plaintiffs have reached out about the flights. Please confirm asap no one lacking a title 8

final order will be taken off these planes when they land. We need to address this asap to avoid contempt. It in particular the flight landing in three minutes. Please advise.

- GXA flight 6143 does not appear to land until 7:20 pm eastern.
- GXA flight 6145 has about at least another hour in flight.
- GXA flight 6122 has not yet left Harlingen.
- •

Sent from my iPhone

On Mar 15, 2025, at 6:53 PM, Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>> wrote:

Thanks. And the two flights in the air?

From:	Elentie, August (CTV)			
то:	Reuveni, Erez R. (CTV);	(CIV);		
Subject:	Fwd: Advice to DHS		and the second	
Date:	Sunday, March 16, 2025 2:28:42 PM			

Hi. Does this get us comfortable with the notice as drafted earlier with the addition of the removed from US airspace line? Drew will be the slash s and make the ECF filing even

Begin forwarded message:

From: "Roth, Yaakov M (CIV)" <Yaakov.M.Roth@usdoj.gov> Date: March 16, 2025 at 2:26:48 PM EDT To: "Flentje, August (CIV)" <August.Flentje@usdoj.gov> Cc: "Reuveni, Erez R. (CIV)" <Erez.R.Reuveni@usdoj.gov>, "Ensign, Drew C (CIV)" <Drew.C.Ensign@usdoj.gov> Subject: Advice to DHS

I have been told by ODAG that the principal associate deputy attorney general advised DHS last night that the deplaning of the flights that had departed US airspace prior the court's minute order was permissible under the law and the court's order.

Sent from my iPhone

3/19/25, 8:33 AM

At this point why dont we just submit an emoji of a middle finger as our filing

a picayune middle finger



29

3/19/25. 10:35 PM

From: To: Cc:	Reuveni, Erez R. (CIV) ; james percival; ; james percival; ; i
Subject:	Re: [EXTERNAL] RE: Abrego Garcia - AEA Return
Date:	Wednesday, April 2, 2025 2:01:51 PM

I don't have clarity on that yet. It remains pending in our building.

Sent from my iPhone

On Apr 2, 2025, at 9:58 AM,

@state.gov> wrote:

Hi Erez,

Have DOJ and DHS leadership coalesced around a strategy of approaching El Salvador to request the release of Abrego into our custody? Are DOJ and DHS leadership asking the State Department to seek assurances on his safety? We want to make sure that everyone is on board with the same strategy before we advise our clients to take those extraordinary steps. They will certainly ask if there's complete agreement within the relevant agencies backing this approach. Or is the strategy to argue that we can't do anything despite the admitted error because he's in another country's custody?

Best,

SBU - LEGAL

From: Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Sent: Wednesday, April 2, 2025 8:45 AM

То:	<pre>@ice.dhs.gov>;</pre>
@state.gov>;	
@ice.dhs.gov>; PERCIVAL,	JAMES <james.percival@hq.dhs.gov></james.percival@hq.dhs.gov>
Cc:	@usdoj.gov>; Mazzara, Joseph
<joseph.mazzara@hq.dhs.gov>;</joseph.mazzara@hq.dhs.gov>	@state.gov>;
@usdoj.gov>;	<pre>@state.gov>;</pre>
@state.gov>;	@state.gov>;

@state.gov>;	@state.gov	/>;
@hq.dhs.gov>;		@hq.dhs.gov>;
@HC	Q.DHS.GOV>; Flentje, August (CIV)	
<august.flentje@usdoj.gov>;</august.flentje@usdoj.gov>		@ice.dhs.gov>;
Ensign, Drew C (CIV) <drew.c.ensi< td=""><td>gn@usdoj.gov></td><td></td></drew.c.ensi<>	gn@usdoj.gov>	

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Good morning everyone. Checking in on this case. As reminder, we will receive a reply brief today at 5 pm and a hearing is scheduled for 1 PM Friday.

Any updates on what the agencies are thinking in terms of things we've been discussing, including:

- 1. Asking to retake custody / return to the US
- 2. Asking for assurances on his safety in CECOT
- 3. The multiagency discussions on how to proceed referenced below and discussed as a possible answer to the court for Friday's hearing on a path forward?

Thanks, Erez

From: Reuveni, Erez R. (CIV) Sent: Monday, March 31, 2025 3:33 PM @ice.dhs.gov>; To: @state.gov>; @ice.dhs.gov>; PERCIVAL, JAMES <<u>JAMES.PERCIVAL@hq.dhs.gov</u>> <u>@usdoj.gov</u>>; Mazzara, Joseph Cc: <Joseph.Mazzara@hg.dhs.gov>; @state.gov>; <u>@usdoj.gov</u>>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; @hq.dhs.gov>; @hq.dhs.gov>; <u>@HQ.DHS.GOV</u>>; Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>>; @ice.dhs.gov>; Ensign, Drew C (CIV) <<u>Drew.C.Ensign@usdoi.gov</u>>

SBU - LEGAL

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

What is the status of the declaration. And can we say in the brief that we are taking steps to correct the error or no. Filing deadline is in 1.5 hrs.
From:	@ice.dhs.gov>
Sent: Monday, March 31, 2025 11:28 AM	
To: Reuveni, Erez R. (CIV) < <u>Erez.R.Reuveni@us</u>	doj.gov>;
@state.gov>;	@ice.dhs.gov>;
PERCIVAL, JAMES < <u>JAMES.PERCIVAL@hq.dhs.</u> g	<u>zov</u> >
Cc:	<u>@usdoj.gov</u> >; Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;	@state.gov>;
@usdoj.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@hq.dhs.gov>;	@hq.dhs.gov>;
@HQ.DHS.GOV>;	; Flentje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;	@ice.dhs.gov>;

Ensign, Drew C (CIV) <<u>Drew.C.Ensign@usdoj.gov</u>>

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Apologies – MS-13. I've had TdA on the brain.



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



*** Warning *** Attorney/Client Privilege *** Attorney Work Product ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Furthermore do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 USC §§ 552(b)(5), (b)(7).

From: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdoj.gov>
Sent: Monday, March 31, 2025 11:21 AM

То:	@ice.dhs.gov>;
@state.gov	>;
@ice.dhs.gov>; PERC	IVAL, JAMES < <u>JAMES.PERCIVAL@hq.dhs.gov</u> >
Cc:	@usdoj.gov>; Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;	@state.gov>;
@usdoj.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;

@hq.dhs.gov>;	<u>@hq.dhs.gov</u> >;
<u>@HQ.DHS.GOV</u> >; Flentje, August (CIV)	
< <u>August.Flentie@usdoj.gov</u> >;	<u>@ice.dhs.gov</u> >;

Ensign, Drew C (CIV) <<u>Drew.C.Ensign@usdoj.gov</u>>

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Paragraph 12 says he was arrested based on his membership in TdA. Do you mean MS-13?

From:	@ice.dhs.gov>
Sent: Monday, March 31, 2025 11:15 AM	
To: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdo	bj.gov>;
@state.gov>;	@ice.dhs.gov>;
PERCIVAL, JAMES < JAMES. PERCIVAL@hq.dhs.gov	<u>v</u> >
Cc:	@usdoj.gov>; Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;	@state.gov>;
@usdoj.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@hq.dhs.gov>;	@hq.dhs.gov>;
<u>@HQ.DHS.GOV</u> >; F	lentje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;	@ice.dhs.gov>;

Ensign, Drew C (CIV) <<u>Drew.C.Ensign@usdoj.gov</u>>

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Attached is Mr. Cerna's draft declaration on the removal for your review. He and I walked through what happened on the ground. It was administrative oversight.

Regarding the five questions:

- 1. This guy is a leader of MS-13 So far I have found "verified member," which is included. I have not found anything indicating "leader," but I'll keep looking.
- 2. His removal was due to a good faith administrative error This is included at para. 16.
- 3. We do not believe he is in immediate danger This gets into country conditions and seems more appropriate for State.
- 4. We are engaged in multiagency discussions Robert is aware that discussions are taking place, but since he's not involved, I don't know that we should get into who is in them. Perhaps leave this to State as well.

5. Any judicial intrusion is likely to make any subsequent diplomatic

discussions with El Sal less successful. - This is well outside his area of

expertise and should be left to State.

Please let me know if you have any questions. He's available all day and know that he will have to sign sometime between 2 and 4.



Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Focusing on Abrego:

There are multiple potential litigation consequences of failing to resolve this without court intervention. First, as you note, we may get an order to return him to the United States. I cannot think of any basis for us to take the position that we can ignore such an order, nor would we at OIL support such a position. Second, we risk making very bad law here that jeopardizes many far more important initiatives of the current administration over one person. Specifically, we risk creating precedent for the notion that El Sal is a contractor for DHS on detention issues, and that courts in the US therefore have habeas jurisdiction to order peoples returns or take other measures. That sort of ruling, far-fetched just two weeks ago, is no longer beyond the realm of possibility. We would certainly recommend appealing such orders depending how they're phrased, but once that domino falls, we'll see dozens of habeas cases across the country in unfavorable jurisdictions advancing this habeas argument. Third, I have not yet heard an explanation as to how we can reopen his order and look for a new country of removal while he is there. Maybe there is a path for that, but then what would be the basis for keeping him at CECOT if no final order of removal?

From: @state.gov	>
Sent: Monday, March 31, 2025 9:22 AM	
To: @ice.	<u>.dhs.gov</u> >; Reuveni <i>,</i> Erez R. (CIV)
< <u>Erez.R.Reuveni@usdoj.gov</u> >; PERCIVAL, JAME	S < <u>JAMES.PERCIVAL@hq.dhs.gov</u> >
Cc:	@usdoj.gov>; Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;	@state.gov>;
@usdoj.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
@state.gov>;	@state.gov>;
<u>@hq.dhs.gov</u> >;	<u>@hq.dhs.gov</u> >;
<u>@hq.dhs.gov</u> >; Fl	entje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;	<pre>@ice.dhs.gov>;</pre>
Ensign, Drew C (CIV) < <u>Drew.C.Ensign@usdoj.gc</u>	>;
@ice.dhs.gov>	

Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

We would have to check whether we could say #5 in good faith. We can ask, but first I'd like DOJ to explain the potential consequences in the litigation if we do not return Abrego to the United States. The judge could find that we violated the JJ's withholding order, and then what? He orders us to return Abrego? Do we have arguments for why such an order would not need to be complied with? Or we go with Joe's idea to reopen his withholding claim on the ground that circumstances have changed? Our leadership is going to want to know what the legal consequences are one way or the other so they can weigh the pros and cons of asking El Salvador.

On a separate note: we saw a press release this morning from our Secretary that 17 further individuals were transferred to CECOT, a mix of TdA and MS13. On what ground were the TdAs transferred? If they were Venezuelans, how did we get around the Massachusetts district court's TRO? And if not under Title 8, and not under Title 50 because of Judge Boasberg's TRO, then under what basis were they removed?

SBU - LEGAL





--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Furthermore do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 U.S.C. § 552(b)(5), (b)(7). From: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdoj.gov>
Sent: Monday, March 31, 2025 9:13:14 AM

To: PERCIVAL, JAMES <<u>JAMES.PERCIVAL@hq.dhs.gov</u>>

Cc:	@state.gov>;	
@usdoj.gc		<u>oh.Mazzara@hq.dhs.gov</u> >;
@sta	<u>ate.gov</u> >;	
@ice.dhs.gc	<u>)v</u> >;	<u>@usdoj.gov</u> >;
@state.	. <u>gov</u> >;	<pre>@state.gov>;</pre>
<u>@</u>	<u>state.gov</u> >;	<pre>@state.gov>;</pre>
@state	<u>.gov</u> >;	<u>@hq.dhs.gov</u> >;
	<u>@hq.dhs.gov</u> >;	
<u>@hq.dhs.gov</u> >; I	Flentje, August (CIV) < <u>Augus</u>	<u>st.Flentje@usdoj.gov</u> >;
	@ice.dhs.gov>; Ens	sign, Drew C (CIV)

<<u>Drew.C.Ensign@usdoj.gov</u>>

Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

If we can get a declaration to that effect, yes.

Sent from my iPhone

On Mar 31, 2025, at 9:11 AM, PERCIVAL, JAMES <<u>JAMES.PERCIVAL@hq.dhs.gov</u>> wrote:

Can we say the following?:

- 1. This guy is a leader of MS-13
- 2. His removal was due to a good faith administrative error
- 3. We do not believe he is in immediate danger
- 4. We are engaged in multiagency discussions
- 5. Any judicial intrusion is likely to make any subsequent diplomatic discussions with El Sal less successful.



We started discussing with DOJ leadership. Just so we understand, what is Department of State leadership's view on this? They're ok asking El Sal to return a member of MS-13 leadership to US custody?



Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

Have DOJ and DHS leadership been briefed and agreed we should seek to have Abrego released back into U.S. custody? As explained yesterday, we are holding on further efforts to contact El Salvador until that question is resolved.

Get Outlook for iOS

SBU - LEGAL

From: Reuveni, Erez R. (CIV) < Erez.R.Reuveni@usdoj.gov > Sent: Monday, March 31, 2025 7:31:29 AM
To: @usdoj.gov>
Cc: Joseph Mazzara < <u>Joseph.Mazzara@hq.dhs.gov</u> >;
@state.gov>;
@ice.dhs.gov>;
@usdoj.gov>; @state.gov>;
<u>@state.gov</u> >;
@state.gov>; @state.gov>;
@state.gov>; @hq.dhs.gov>;
@hq.dhs.gov>;
@hq.dhs.gov>; Flentje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;
@ice.dhs.gov>; JAMES PERCIVAL
< <u>JAMES.PERCIVAL@hq.dhs.gov</u> >; Ensign, Drew C (CIV)
< <u>Drew.C.Ensign@usdoj.gov</u> >
Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

+ Drew. When reviewing please also take a look at what the draft says about the funding issue. We'd also appreciate an update on what the draft can say on efforts to contact El Salvador and ask for the return of this individual to U.S. custody.

Sent from my iPhone



Hello all,

Please find attached our draft response to the TRO motion, including two exhibits. For your convenience, I also attach the complaint, renewed TRO motion, and Plaintiffs' memorandum in support.

The deadline for filing is 5:00 p.m. EDT Monday, so we would please request any comments or suggestions no later than 1:00 p.m. Thank you.

Sincerely,

<pre>From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>></pre>
Sent: Friday, March 28, 2025 5:44 PM
То:
@usdoj.gov>;
@state.gov>;
@state.gov>;
@ice.dhs.gov>; Reuveni, Erez R. (CIV)
< <u>Erez.R.Reuveni@usdoj.gov</u> >
Cc: @usdoj.gov>;
@state.gov>;
<u>@hq.dhs.gov</u> >;
<u>@hq.dhs.gov</u> >;
@HQ.DHS.GOV>; Flentje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;
@ice.dhs.gov>; PERCIVAL, JAMES
<james.percival@hq.dhs.gov></james.percival@hq.dhs.gov>

Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

Thanks. This isn't particularly complex. I would like to personally review our response as soon as you can get it to us.

From:
@usdoj.gov>
Sent: Friday, March 28, 2025 4:51:33 PM
To: Mazzara, Joseph < <u>Joseph.Mazzara@hq.dhs.gov</u> >;
@state.gov>;

@state.gov>;
@ice.dhs.gov>;
@usdoj.gov>
Cc: @usdoj.gov>;
@state.gov>;
@hq.dhs.gov>;
@hq.dhs.gov>;
<pre>@HQ.DHS.GOV>; Flentje, August (CIV)</pre>
< <u>August.Flentje@usdoj.gov</u> >;
@ice.dhs.gov>; PERCIVAL, JAMES
<james.percival@hq.dhs.gov></james.percival@hq.dhs.gov>
Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Hello all,

Here is plaintiffs' memorandum in support of the TRO (12 pages plus exhibits).

Sincerely,

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>>
Sent: Friday, March 28, 2025 2:46 PM



Thank you.

From: <u>@state.gov</u> >
Sent: Friday, March 28, 2025 2:45:29 PM
To: Mazzara, Joseph < <u>Joseph.Mazzara@hq.dhs.gov</u> >;
@state.gov>;
@ice.dhs.gov>; Reuveni, Erez R. (CIV)
< <u>Erez.R.Reuveni@usdoj.gov</u> >
Cc: @usdoj.gov>;
@state.gov>;
@hq.dhs.gov>;
@hq.dhs.gov>;
@HQ.DHS.GOV>;
@usdoj.gov>; Flentje, August (CIV)
< <u>August.Flentje@usdoj.gov</u> >;
@ice.dhs.gov>; PERCIVAL, JAMES
< <u>JAMES.PERCIVAL@hq.dhs.gov</u> >
Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Excellent - thanks. We'll let post in San Salvador know now.



SBU - LEGAL

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>> Sent: Friday, March 28, 2025 2:37 PM To: @state.gov>; @@state.gov>; @@state.gov>; @@ice.dhs.gov>; Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>; Cc: @usdoj.gov>;



Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

I just spoke with S1. I received a verbal waiver such that State can disclose to ElSal for the purposes of obtaining assurances that they will segregate him from any Barrio 18 member. Also, yeah, if the guy voluntarily made this public in a court filing then I'm not sure how it's still confidential. Regardless, we have a waiver.



Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

Yes, our embassy has reported that they do.

On the basis for disclosing, would Abrego Garcia's inclusion of this material in the written public court filing not count as "the written consent of the applicant" for 8 CFR 208.6(a) purposes? And if not, is there a way to disclosure that is "at the discretion of the Secretary" (presumably a confidentiality waiver by S1 as referenced earlier in this thread)?



U.S. Department of State

SENSITIVE BUT UNCLASSIFIED

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>> Sent: Friday, March 28, 2025 1:23 PM



Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

Does El Sal even detain Barrio 18 in CECOT?

From: @state.gov> Sent: Friday, March 28, 2025 10:53:22 AM



Subject: RE: [EXTERNAL] RE: Abrego Garcia - AEA Return

In addition to any more info you have on the basis for ICE's determination about his MS-13 affiliation, reminder that we also need clearance on some legal theory for the Ambassador to say something about how and why Abrego has a credible fear of violence from Barrio 18 members, in order to explain why the prison should segregate or otherwise protect him.

SBU - LEGAL

From: @ice.dhs.gov>
Sent: Friday, March 28, 2025 10:45 AM
To: Reuveni, Erez R. (CIV) < <u>Erez.R.Reuveni@usdoj.gov</u> >
Cc: @state.gov>; Mazzara,
Joseph < <u>Joseph.Mazzara@hq.dhs.gov</u> >;
@state.gov>;
@usdoj.gov>;
@state.gov>;
@hq.dhs.gov>;



Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

+ from OPLA who is chasing down any additional available information with ICE operators.



--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Furthermore do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 U.S.C. § 552(b)(5), (b)(7).

From: Reuveni, Erez R. (CIV) < <u>Erez.R.Reuveni@usdoj.gov</u>>

Sent: Friday, March 28, 2025 10:30:13 AM To: @ice.dhs.gov> Cc: <u>@state.gov</u>>; Mazzara, Joseph < Joseph.Mazzara@hg.dhs.gov>; @state.gov>; @usdoj.gov>; <u>@state.gov</u>>; @state.gov>; <u>@state.gov</u>>; @state.gov>; @state.gov>; @hq.dhs.gov>; <u>@hq.dhs.gov</u>>; <u>@hq.dhs.gov</u>>; <u>@usdoj.gov</u>>; Flentje, August (CIV) <<u>August.Flentie@usdoi.gov</u>>; @ice.dhs.gov>

Subject: Re: [EXTERNAL] RE: Abrego Garcia - AEA Return

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Good morning all. Checking in on this one given our need to confer with plaintiffs counsel later today.

Sent from my iPhone



I will loop around with them to confirm, but I think this may be all they have.

Thanks,







CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Thanks. It gives a lot of info on that incident being pulled over in Tennessee that led to no citation, and very little on why he's believed to be a member of MS-13:

Per the Prince Georges County Police Gang Unit, ABREGO-Garcia was validated as a member of the Mara Salvatrucha (MS13) Gang. Subject was identified as a member of the Mara Salvatrucha MS-13, "Chequeo" from the Western Clique a transnational criminal street gang. This information was provided by tested source who has provided truthful accurate information in the past. See Prince Georges County Police Department (Gang Sheet).

Does HSI have that Gang Sheet or other information that goes to why the source thought he was MS-13?

SBU - LEGAL



designation. It cannot be shared with El Sal but the general issue can be discussed.



--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Furthermore do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 U.S.C. § 552(b)(5), (b)(7).



I should clarify: both of those pieces of info will be important to have as soon as you can get them: (1) a legal basis on which to disclose the basis for Abrego's fear; and (2) the source document describing in more detail the basis for his MS-13 designation. Thanks.

SBU - LEGAL



OK, thanks – that'll be important to receive as soon as you can get it to us. I'm told that CECOT does not segregate members of different gangs from one another.

From:
@ice.dhs.gov>
Sent: Thursday, March 27, 2025 6:47 PM
To: <u>@state.gov</u> >;
Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;
@state.gov>;
@usdoj.gov>;
@state.gov>;
@hq.dhs.gov>;

@hq.dhs.gov>; <u>@HQ.DHS.GOV</u>> **Cc:** Reuveni, Erez R. (CIV)

<<u>Erez.R.Reuveni@usdoj.gov</u>>;

<u>@usdoj.gov</u>>; Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>> **Subject:** Re: Abrego Garcia - AEA Return



We are considering options internally. However, the provision you highlight cannot be used to disclose the information because it was added by the Global Asylum Rule and is currently enjoined by *Pangea Legal Servs. v. U.S. Dep't of Homeland Sec.*, 512 F.Supp.3d 966 (N.D. Cal. 2021).



--- ATTORNEY/CLIENT PRIVILEGE --- ATTORNEY WORK PRODUCT ---

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this email has been misdirected and immediately destroy all originals and copies. Furthermore do not print, copy, re-transmit, disseminate, or otherwise use this information. Any disclosure of this communication or its attachments must be approved by the Office of the Principal Legal Advisor, U.S. Immigration and Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and may be exempt from disclosure under the Freedom of Information Act, 5 U.S.C. § 552(b)(5), (b)(7).





Thanks. So how about my other question – can we rely on 208.6(e)(2) to tell the Salvadorans about the reasons he was granted withholding? That's the other piece of info the Ambassador needs.

SBU - LEGAL





We are still working on getting our hands on the source document, but I have been advised that ICE HSI received the MS-13 verification from Prince Georges County Police Department, part of the Combined Intelligence Unit, in the form of an investigative referral.

<u>Arrest of Salvadorian National with</u> <u>Criminal Charges</u>

(Cleared for Media) ICE/HSI Maryland Homeland Security Task Force apprehend Kilmar Armando ABREGO-Garcia, 29, a citizen of El Salvador and a member of the Western clique of La Mara Salvatrucha, MS-13 based on an investigative referral from the Combined Intelligence Unit. ABREGO-Garcia is suspected of being involved in human and or labor trafficking based on a prior encounter by Tennessee law enforcement. ABREGO-Garcia will be processed by HSI and held for removal.



*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this

document or information contained therein must be approved by the

Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).

SBU - LEGAL



CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

Can DHS tell us whether 208.6(e)(2) would provide an exception in these circumstances? The theory being that we'd be disclosing the info in order to help protect him from being victimized by other inmates.

Also, any luck yet finding more details

about the basis for his MS-13 classification? The Embassy will likely be asked for more info about the basis on which we deemed him to be a member.





Subject: Re: Abrego Garcia - AEA Return

Actually, under 8 CFR 208.6, we cannot disclose that he has withholding of removal (absent an asylum confidentiality waiver by S1). So that forecloses that.

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>> Sent: Thursday, March 27, 2025 2:47:36 PM To: @state.gov>;



Hi

Thanks for the email. I think what we want to ask for is an assurance that El Sal will protect him from Barrio 18 while in their custody. There shouldn't be an issue talking about his withholding of removal.

Regarding his status as a member of MS-13, I think is running down that info. I think the question of whether he was one of the MS-13 members El Sal expressly asked for is a different question, but I could be misunderstanding.

From:

@state.gov> Sent: Thursday, March 27, 2025 2:42 PM To: Mazzara, Joseph <Joseph.Mazzara@hq.dhs.gov>;



I agree he should be brought back to the US if El Sal will release him back to us, and we should take steps to help ensure his safety in the meantime. Our Ambassador will need to be able to explain to the Gov't of El Sal why he's asking about Abrego's conditions and MS-13 status. Is it OK to share with the Gov't of El Sal the background here, including that he's subject to withholding of removal to El Sal based on fear of persecution by Barrio 18? I assume so given that it's all in the plaintiff's public filing -but or Joe, we wanted to make sure you don't see some problem with that.



SBU -LAW ENFORCEMENT





Ok, if we can get some evidence that El Sal commits to protecting him from the other gang (State, is that possible?), let's get that process going of reversing this withholding ruling. We should also consider informing the court once we have that evidence in hand about his safety, if we can get it.

I'm with Erez, we want to make sure everyone knows this gentleman is alright if it takes us time to get el sal to send him back.



Cc: Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>; @usdoj.gov>; Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>>; @usdoj.gov>

Subject: RE: Abrego Garcia - AEA Return

All-

Although it may take time – weeks or months – and is not a sure thing, it would be worthwhile for OPLA to pursue termination of the alien's grant of statutory withholding of removal simultaneously with the federal litigation and working to return him to the United States.

There is no express statutory termination process for withholding of removal. Grounds for termination set forth at 8 C.F.R. § 1208.24(b) include:

- Fundamental change in circumstances such that life or freedom would no longer be threatened on account of protected ground;
- Fraud in initial application; and
- Committing an act that would have barred withholding had it occurred prior to grant.

IJs and the BIA may reopen removal proceedings for the purpose of terminating withholding of removal, with the burden on DHS to establish by a preponderance of the evidence the grounds for terminating. 8 C.F.R. § 1208.24(f). The DHS motion to reopen removal proceedings must comply with the motion to reopen requirements, namely presenting material and previously unavailable evidence.

We may be able to meet that standard with evidence from the State Department that the Government of El Salvador would be able and willing to protect him. Perhaps an agreement from the Government of El Salvador to keep him safe? Also, I am trying to get information on why ICE believes he is MS-13.

Thanks,



CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, click <u>here</u> and follow instructions.

I'll ask the Embassy, but in the meantime I'd like to see if the answer my other Qs below about how it is that ICE identified him as MS-13. It goes to how likely it is that Bukele will also consider him MS-13 and not want to release him.

SBU - LEGAL



I do not.



U.S. Immigration and Customs Enforcement

*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).

From: Mazzara, Joseph

<Joseph.Mazzara@hq.dhs.gov>



Subject: Re: Abrego Garcia - AEA Return

I think knowing whether and how they're segregated from MS-13 could be relevant here. **1999**, do you have that info? If not, does anyone know how we can obtain that? That seems like an easy ask.



Subject: RE: Abrego Garcia - AEA Return

My understanding is that there are many members of Barrios 18 in CECOT. I don't know whether or how they are segregated from MS-13 or other gangs.

, what does it take to get categorized with an MS-13 affiliation in ERO's system? Are you able to see the grounds for his MS-13 affiliation? Do you know how it was that he ended up being identified as one of the 13 additional Salvadorans sent on March 15,

SBU - LEGAL

From: Mazzara, Joseph <Joseph.Mazzara@hg.dhs.gov> Sent: Thursday, March 27, 2025 12:33 PM To: <u>@ice.dhs.gov</u>>; @state.gov>; <u>@usdoj.gov</u>>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; <u>@hq.dhs.gov</u>>; <u>@hq.dhs.gov</u>>; <u>@HQ.DHS.GOV</u>> **Cc:** Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>; <u>@usdoj.gov</u>>; Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>>; @ice.dhs.gov> Subject: Re: Abrego Garcia - AEA Return

Also, if el sal agrees to protect him from Barrios 18, and we can supplement record with that evidence, that can also help alleviate urgency in resolving this as a practical matter. Not sure why the court wouldn't agree.





This may be a State Q. Are there any Barrios 18 people held in CECOT? At the very least, if we can get that info and it is no, maybe we can tell the court we are working this but that the danger as a practical matter is low while we're working a solution.


@usdoj.gov>; Flentje,

August (CIV) <<u>August.Flentje@usdoj.gov</u>>;

@ice.dhs.gov>

Subject: RE: Abrego Garcia - AEA Return

Joseph-

His claim is that father was a police officer, and he said that he and his family were targeted by the Salvadoran gang Barrios 18. He was granted statutory withholding. He was time barred for asylum, and the IJ found that there were no grounds for exception. The IJ found, however, that he established past persecution based on a protected ground, and the presumption of a well- founded fear of future persecution. DHS was not able to rebut these findings or show changed circumstances, so he was granted withholding under the Act. ERO's system shows MS-13 affiliation.

Of course, please let me know if you need additional information.

Thanks,



*** ATTORNEY/CLIENT PRIVILEGE *** ATTORNEY WORK PRODUCT ***

This communication and any attachments may contain confidential and/or sensitive attorney/client privileged information or attorney work product and/or law enforcement sensitive information. It is not for release, review, retransmission, dissemination, or use by anyone other than the intended recipient. Please notify the sender if this message has been misdirected and immediately destroy all originals and copies. Any disclosure of this document or information contained therein must be approved by the Office of the Principal Legal Advisor, U.S. Immigration & Customs Enforcement. This document is for INTERNAL GOVERNMENT USE ONLY and is FOIA exempt under 5 U.S.C. § 552(b)(5), (b)(7).

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>> Sent: Thursday, March 27, 2025 11:55 AM To: <u>@state.gov</u>>;



*group that he's actually afraid of

From: Mazzara, Joseph <<u>Joseph.Mazzara@hq.dhs.gov</u>> Sent: Thursday, March 27, 2025 11:52 AM To: @state.gov>; <u>@usdoj.gov</u>>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; @state.gov>; <u>@state.gov</u>>; @hq.dhs.gov>; @hq.dhs.gov>; <u>@HQ.DHS.GOV</u>>; @ice.dhs.gov> Cc: Reuveni, Erez R. (CIV) <<u>Erez.R.Reuveni@usdoj.gov</u>>; @usdoj.gov>; Flentje,

August (CIV) <<u>August.Flentje@usdoj.gov</u>> **Subject:** Re: Abrego Garcia - AEA Return

Also, **any**, can you chime in here on what groupings actually afraid of?

From: @state.gov>
Sent: Thursday, March 27, 2025 11:49:59 AM
То:
@usdoj.gov>;
@state.gov>;
@hq.dhs.gov>;
@hq.dhs.gov>;
<u>@HQ.DHS.GOV</u> >;
@ice.dhs.gov>;
Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >
Cc: Reuveni, Erez R. (CIV)
< <u>Erez.R.Reuveni@usdoj.gov</u> >;
<u>@usdoj.gov</u> >; Flentje,
August (CIV) < <u>August.Flentje@usdoj.gov</u> >
Subject: RE: Abrego Garcia - AEA Return

This email is from an external US Government agency.



Before we explore this with clients and the Embassy, is high-level leadership at DHS and DOJ amenable to a solution whereby Bukele releases him from CECOT and he is flown back to the United States? I suspect the Embassy is going to want to know whether this is actually a feasible option before they start having conversations with Salvadoran authorities.



Best,



SBU - LEGAL

From:	
	@usdoj.gov>
Sent: Thu	rsday, March 27, 2025 11:41 AM
То:	@state.gov>;
	@state.gov>;



@usdoj.gov>; Flentje, August (CIV) <<u>August.Flentje@usdoj.gov</u>> **Subject:** Abrego Garcia - AEA Return

Hi, Connecting the DHS and State teams to discuss our return options for this individual. I am attaching the full set of the briefing here to be sure everyone has all relevant docs.

State friends, I think the first request on the table is for your assessment of the feasibility of asking for Abrego Garcia to be returned to our custody. Could you give us an initial assessment today and then a sense of the timeline for a more vetted response (if not today)?

Re litigation-driven timing, we need to have a sense of where we think this is going by tomorrow afternoon so we can confer with opposing counsel, and we will need to be able to put our position in a brief on Monday.



Office of Immigration Litigation

Give me a call at some point

Got a nastygram from Emil Bove

That was conveyed to me by yaakov you should hear about

Uh oh

75

4/1/25, 6:43 PM

From:	(CIV)
To:	Mazzara, Joseph; (HQ);
Cc:	(CIV); Flentie, August (CIV); Reuveni, Erez R. (CIV); (CIV); (CIV); PERCIVAL, JAMES;
Subject:	RE: DVD Injunction Plaintiff Inquiries
Date:	Wednesday, April 02, 2025 3:41:22 PM

DHS,



Additionally, we have received some inquiries from USAOs regarding potential lawsuits filed by aliens covered by the DVD nationwide TRO. We have informed them of the nationwide TRO, but want to again confirm whether written notice of the terms of that injunction have been circulated to ICE OPLA and ERO offices, in addition to the guidance signed by DHS on third country removals on Sunday.

Thanks,

From: Mazzara, Joseph < Joseph.Mazz	ara@hq.dhs.gov>
Sent: Tuesday, April 01, 2025 8:57 PM	1
То:	@usdoj.gov>;
<pre>@hq.dhs.gov>;</pre>	@HQ.DHS.GOV>
Cc:	@usdoj.gov>; Flentje, August (CIV) <august.flentje@usdoj.gov>;</august.flentje@usdoj.gov>
Reuveni, Erez R. (CIV) < Erez.R. Reuven	i@usdoj.gov>;
@usdoj.gov>;	@usdoj.gov>; PERCIVAL,
JAMES < JAMES.PERCIVAL@hq.dhs.gov	v>; @ice.dhs.gov>
Subject: [EXTERNAL] Re: DVD Injunction	on Plaintiff Inquiries

As to the operations referenced by Secretary Rubio, DHS was not involved in those operations.

From:	@usdoj.gov>
Sent: Tuesday, April 1, 2025 7:20 PM	N
То:	<u>@hq.dhs.gov</u> >; Mazzara, Joseph
< <u>Joseph.Mazzara@hq.dhs.gov</u> >;	@HQ.DHS.GOV>
Cc:	<u>@usdoj.gov</u> >; Flentje, August (CIV)

@usdoj.gov>;

<u>@usdoj.gov</u>>

Subject: DVD Injunction Plaintiff Inquiries

This email is from an external US Government agency.

DHS,

Following up on our prior email with a smaller group.

We have received the below two emails from Plaintiffs' counsel concerning first media reports and subsequently what they say is the removal of one of the named plaintiffs in the GTMO detention litigation.

Can you please let me know if you have any responses to their inquiries? We expect Plaintiffs to file a motion in the next day or so if we do not respond and we expect that DHS will be ordered to respond to some version of these inquiries.

Thank you,

Good afternoon

I am writing to follow up regarding our inquiry as we have received information that at least one of the 17 individuals referred to by Secretary Rubio had a final order and was not a Salvadoran national.



Can you please advise whether Defendants acknowledge his removal was in violation of the district court? If Defendants believe his removal did not violate the TRO, can you please advise if any of the information we have communicated in this email regarding **sector** is not correct or any other basis for asserting this does not violate the TRO?

In addition, we continue to wait for your responses regarding the other 16 individuals as well as confirmation that no one is currently being removed pursuant to the March 30, 2025 Guidance submitted by Defendants in this case.

Thank you for your prompt attention in this important matter. We look forward to following up with you and discussing next steps.

Counsel,

A few hours ago, Secretary of State Rubio reposted a tweet from Nayib Bukele indicating that 17 individuals were transferred from U.S custody to El Salvador. See https://x.com/SecRubio. This followed a post from Secretary Rubio to similar effect on the same platform (https://x.com/SecRubio/status/1906684174020284784). The State Department has also posted an announcement on its website titled "More Foreign Gang Terrorists Deported Out of America" (see https://www.state.gov/more-foreign-gang-terrorists-deported-out-of-america/).

Were all of these 17 people Salvadoran nationals, and if not, can you please provide more information, specifically whether any of them had final removal orders?

In addition, can you confirm that no one is currently being removed pursuant to the March 30, 2025 Guidance?

If any non-Salvadorans among the 17 individuals described in Secretary Rubio's statements had final removal orders, or if noncitizens are being subjected to removal under the Guidance, that would violate the TRO, and we immediately request a meet and confer.

We look forward to hearing back from you soon.

You were at a certain meeting too

4/5/25, 2:46 PM

believe I told our host we would not violate a court order. I think there is definitely a chrough line from that meeting to where we are today.

81



Mr. Reuveni – see the attached Deputy Attorney General notification of your placement in an administrative leave status effective immediately. If you have questions, please contact (cc'd) on this message.

v/r



Justice Management Division U.S. Department of Justice

Confidentiality Notice: This email message, along with any attachments, may contain confidential and legally privileged information subject to the Privacy Act of 1974 and is For Official Use Only. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, use or copying of this message is strictly prohibited. If you have received this in error, please reply to the sender and delete this message.

Reuveni Admin Leave Letter_signed.pdf 243 KB





U.S. Department of Justice

Washington, D.C. 20530

Erez Reuveni Office of Immigration Litigation Civil Division

Dear Mr. Reuveni:

This letter provides notice that the Department is placing you on administrative leave effective today, with full pay and benefits for failure to follow a directive from your superiors; failure to zealously advocate on behalf of the United States; and engaging in conduct prejudicial to your client.

Please note the following:

- **Pay and Benefits:** You will continue to receive your full salary and benefits during the entirety of this administrative leave period.
- Work Responsibilities: You are not required or expected to perform any work-related tasks during this period of administrative leave.
- Office Attendance: You are not required or expected to come to the office during this time.
- **Email Access:** Your department email access will be suspended. Please make sure that your address of record and contact information are current with your office.

If you have any concerns or questions, please contact @usdoj.gov.

Respectfully,

Todd Blanche Deputy Attorney General



Mr. Reuveni - see attached notice removing you from federal service effective immediately.

v/r



Confidentiality Notice: This email message, along with any attachments, may contain confidential and legally privileged information subject to the Privacy Act of 1974 and is For Official Use Only. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, use or copying of this message is strictly prohibited. If you have received this in error, please reply to the sender and delete this message.



U.S. Department of Justice



U.S. Department of Justice

Washington, D.C. 20530

MEMORANDUM FOR EREZ REUVENI

FROM: THE DEPUTY ATTORNEY GENERAL

Notice of Removal from the Federal Service SUBJECT:

This memorandum serves as official notice that you are removed from you position as a Supervisory Trial Attorney, GS-0905-15, Civil Division, Office of Immigration Litigation, General Litigation and Appeals Section, and from federal service, effective immediately. Pursuant to Article II of the Constitution and the laws of the United States, your employment with the Department of Justice is hereby terminated.

If applicable, you may have a right to file an appeal of this removal with the U.S. Merit Systems Protection Board (MSPB) within 30 days of the effective date of the removal action. For more information on how to file an appeal with the MSPB, please visit www.mspb.gov.

Deputy Attorney General

4-11-2025 Date

I acknowledge receipt of this notice of removal. I understand that my acknowledgment of receipt does not constitute agreement with the action, and I understand that my refusal to acknowledge receipt does not void or otherwise prevent the removal action.





KEYLINE In hill million all mild data di data d

EREZ REUVENI

Billing period: Mar 17 - Apr 16, 2025

Questions about your bill? verizon.com/support 800-922-0204

details on page 3)		

If you don't pay the total charges due by the due date, you'll be charged 5% of the unpaid balance or \$7, whichever is greater, if allowed by law in the state of your billing address.



Please see back for instructions on writing to us.

P.O. BOX 15062 ALBANY, NY 12212-5062

հահետենունենենենունեստենեն



Billing period: Mar 17 - Apr 16, 2025

Talk activity

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
17	11:41 AM	9643	Washington, DC	Incoming, CL	9			
lar 17	1:43 PM	7275	Washington, DC	New York, NY	3			
lar 17	1:47 PM	9643	Washington, DC	Incoming, CL	2			
1ar 17	2:22 PM	7275	Washington, DC	Incoming, CL	2			
17	4:39 PM	7275	Washington, DC	Incoming, CL	9			
lar 17	6:44 PM	7275	Bethesda, MD	Incoming, CL	15			
ar 17	9:34 PM	7275	Bethesda, MD	New York, NY	22			
					I			
lar 18	11:00 AM	7275	Washington, DC	Incoming, CL	3			
ar 18	11:10 AM	7275	Washington, DC	Incoming, CL	2			
ar 18	8:02 PM	7275	Bethesda, MD	New York, NY	4			
ar 18	8:34 PM	7275	Bethesda, MD	Incoming, CL	17			
ar 18	9:34 PM	7275	Bethesda, MD	Incoming, CL	8			
ar 18	11:22 PM	7275	Bethesda, MD	New York, NY	11			
lar 19	9:00 AM	7275	Bethesda, MD	Incoming, CL	3			
lar 19	9:08 AM	7275	Bethesda, MD	Incoming, CL	1			
			· · ·	3,				
					-			
lar 19	10:26 AM	7275	Bethesda, MD	Incoming, CL	1			
lar 19	10:31 AM	7275	Washington, DC	New York, NY	13			
								-
ar 19	4:47 PM	7275	Washington, DC	Incoming, CL	1			
	- TT /T 101	1210	Maonington, DO	inconing, oe				-
					_			
					_		-	
					_		-	
					_			<u> </u>
ar 20	9:39 AM	7275	Washington, DC	New York, NY	10			
	9:39 AM	/2/5	vvasnington, DC	NEW YORK NY	10			

verizon

Billing period: Mar 17 - Apr 16, 2025

Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
		ð					1	
					_			
Aar 20	5:48 PM	7275	Bethesda, MD	New York, NY	7			
					_		<u> </u>	_
_	_				_			_
							<u> </u>	_
_					_		-	_
					_			-
0	_			-	_		-	-
					_		-	-
Acr 01	10.41 DM	7275	Weekington DC	Incoming CI	2	**	**	
/lar 21	12:41 PM	1215	Washington, DC	Incoming, CL	3			
Mar 21	4:42 PM	7275	Weekington DC	Incoming OI	1			_
viar 21	4:42 PM	1215	Washington, DC	Incoming, CL				
2					<u> </u>		-	
					_			-
					-			-
					_			-
-							-	-
					_		-	-
	_				_		-	-
_	_				_			-
							-	-
		_					-	-
							-	
					_		3 - 3	
1					_		-	-
Mar 22	7:07 PM	7275	Bethesda, MD	Incoming, CL	3			
Mar 23	3:51 PM	7275	Bethesda, MD	Incoming, CL	24		**	
	0.0111	12/0	Bothooda, mB	incoming, or			2 1	
					-		1	
					_			
					-			-
							-	
					-		**	
							10.0×	
Mar 24	12:48 PM	9643	Washington, DC	Washington, DC	1			
				3				
Mar 24	5:02 PM	7275	Washington, DC	Incoming, CL	10			
Mar 24	6:29 PM		Bethesda, MD	Incoming, CL	1			
							6	
							1	1
Aar 25	9:54 AM	7275	Washington, DC	Incoming, CL	7		20	
Mar 25	10:48 AM		Washington, DC	Washington, DC	1			(22)



Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
Mar 25	10:51 AM	9643	Washington, DC	Incoming, CL	5			
/ar 25	10:56 AM	9643	Washington, DC	Incoming, CL	1			
Aar 25	12:40 PM	7275	Washington, DC	New York, NY	3			
/ar 25	12:44 PM	7275	Washington, DC	New York, NY	4			
/ar 25	4:09 PM	7275	Washington, DC	Incoming, CL	6			
/ar 25	4:22 PM	7275	Washington, DC	Incoming, CL	3			
/ar 25	4:26 PM	7275	Washington, DC	Incoming, CL	17			
/ar 25	5:57 PM	9643	Bethesda, MD	Incoming, CL	3			
1ar 26	4:36 PM	7275	Washington, DC	Incoming, CL	20			
/ar 26	6:11 PM	7275	Bethesda, MD	New York, NY	16			
/ar 27	11:41 AM	7275	Washington, DC	Incoming, CL	1			
/ar 27	11:41 AM	7275	Washington, DC	Incoming, CL	1			
/lar 27	11:41 AM	7275	Washington, DC	Incoming, CL	16			
1ar 27	4:08 PM	7275	Washington, DC	Incoming, CL	1			
1ar 27	4:32 PM	7275	Washington, DC	Incoming, CL	9			
1ar 27	5:24 PM	7275	Washington, DC	Incoming, CL	2			
1ar 28	7:58 AM	9643	Bethesda, MD	Washington, DC	3			
/lar 28	11:36 AM	7275	Washington, DC	Incoming, CL	2			
/ar 28	11:43 AM	7275	Washington, DC	Incoming, CL	16			
1ar 28	1:26 PM	9643	Washington, DC	Incoming, CL	3			
/ar 28	2:58 PM	7275	Washington, DC	Incoming, CL	2			



Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charge	es Total
/lar 28	2:59 PM	7275	Washington, DC	New York, NY	6			
lar 28	3:24 PM	7275	Washington, DC	Incoming, CL	10			
1ar 28	4:13 PM	7275	Washington, DC	Incoming, CL	5			
								-
								_
								_
lan 00	C 10 DM	17075	Detheede MD	Navy Yark NY				
lar 28	6:10 PM	7275	Bethesda, MD	New York, NY	5			
lar 28	712 DM	7275	Bothoodo MD	Incoming CI	1			
lar 28 1ar 28	7:13 PM 7:25 PM	7275	Bethesda, MD Bethesda, MD	Incoming, CL	1			
iai 20	7:23 PIVI	1213	Betriesda, MD	Incoming, CL				
					_			_
					_			_
lar 28	8:18 PM	7275	Bethesda, MD	New York, NY	2			
	0.101 M	7270	Betheoda, mB	new rong ni				
lar 28	8:45 PM	7275	Bethesda, MD	Incoming, CL	2			
					- î			
lar 28	9:44 PM	7275	Bethesda, MD	New York, NY	15			
lar 28	10:00 PM	9643	Bethesda, MD	Washington, DC	1			
lar 28	10:01 PM	9643	Bethesda, MD	Washington, DC	10			
lar 28	10:20 PM	7275	Bethesda, MD	Incoming, CL	2			
1ar 28	10:41 PM	9643	Bethesda, MD	Washington, DC	2			
lar 28	10:42 PM		Bethesda, MD	Incoming, CL	10			
lar 28	11:00 PM	7275	Bethesda, MD	Incoming, CL	1			
lar 28	11:00 PM	7275	Bethesda, MD	Incoming, CL	9			
lar 28	11:24 PM	7275	Bethesda, MD	New York, NY	2			
1ar 28	11:42 PM	7275	Bethesda, MD	Incoming, CL	1			



Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
1ar 28	11:42 PM	7275	Bethesda, MD	Incoming, CL	2		a, at	
lar 29	12:04 AM	7275	Bethesda, MD	Incoming, CL	1			
1ar 29	12:04 AM	7275	Bethesda, MD	Incoming, CL	2		**	
lar 29	12:54 AM	0091	Bethesda, MD	Washington, DC	15			
							2	
Aar 29	1:13 AM	8942	Bethesda, MD	Washington, DC	6			
Aar 29	1:50 AM	7275	Bethesda, MD	Incoming, CL	1	-	<u></u>	**
Aar 29	1:51 AM	7275	Bethesda, MD	Incoming, CL	3		(m.)	
Aar 29	1:53 AM	7275	Bethesda, MD	Incoming, CL	4			
							3	
					1			7
					1			1
					1			
Aar 29	3:45 PM	7275	Washington, DC	New York, NY	17			
							14 A	
					1			1
					1			
Aar 29	4:49 PM	7275	Washington, DC	New York, NY	21			
Aar 29	5:50 PM	7275	Washington, DC	Incoming, CL	4	**		
				3,	1			1
Aar 29	9:48 PM	7275	Bethesda, MD	Incoming, CL	1			
				3,	- i			
/ar 30	11:05 AM	7275	Silver Spr, MD	New York, NY	21			
								1
					1		1	
Aar 30	8:22 PM	7275	Bethesda, MD	Incoming, CL	3			12
Aar 30	8:48 PM	7275	Bethesda, MD	Incoming, CL	1			
				51				
								1
					1		1.00	
					1			1
								1
					1			1
								1
					-		-	-
lar 31	9:35 AM	7275	Bethesda, MD	Incoming, CL	5			
				sat i				
	9:57 AM	2326	Bethesda, MD	Wshngtnzn1, DC	1			
Aar 31	10:01 AM	2326	Bethesda, MD	Incoming, CL	5			
Aar 31	10:06 AM		Bethesda, MD	Wsngtnzn17, VA	2			**
					-			
						-	1	1
								-



Talk activity (cont.)

Date	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges T	otal
	10.40							
/lar 31	10:40 AM	7275	Bethesda, MD	New York, NY	10			-
/lar 31	11:05 AM	9643	Bethesda, MD	Incoming, CL	1			
	1.00 / 101	3040	Betriesda, MB	meening, oe				
1ar 31	11:40 AM	9643	Bethesda, MD	Incoming, CL	4			-
1ar 31	11:49 AM	7275	Bethesda, MD	Incoming, CL	10			-
1ar 31	12:40 PM	7275	Bethesda, MD	Incoming, CL	5			-
1ar 31	1.10 DM	2025	Detheede MD	New Yerk NV	10			
iar 31	1:16 PM	7275	Bethesda, MD	New York, NY	12			-
					_			
1ar 31	2:01 PM	7275	Bethesda, MD	New York, NY	5			-
	2.0111	1210	Betriebaa, mB				•	
lar 31	3:14 PM	7275	Bethesda, MD	Incoming, CL	3			-
1ar 31	3:44 PM	7275	Bethesda, MD	New York, NY	2			-
lar 31	4:23 PM	7275	Bethesda, MD	Incoming, CL	7			-
lar 31	5:08 PM	7275	Bethesda, MD	Incoming, CL	9			-
	0.40 DM	3075						
ar 31	6:10 PM	7275	Bethesda, MD	Incoming, CL	14			-
					_			
pr 1	11:15 AM	7275	Washington, DC	Incoming, CL	1			
pr1	12:11 PM	7275	Washington, DC	Incoming, CL	21			
			i i alemani greni, p e					1
pr 1	3:35 PM	9643	Washington, DC	Incoming, CL	1			-
pr 1	4:05 PM	9643	Washington, DC	Washington, DC	9			
							-	
pr 1	6:23 PM	7275	Bethesda, MD	Incoming, CL	12			-



Billing period: Mar 17 - Apr 16, 2025

Talk activity (cont.)

ate	Time	Number	Origination	Destination	Min.	Airtime Charges	LD/Other Charges	Total
								<u> </u>
								<u> </u>
								-
					_		-	
								-
								-
								-
								-
								1
or 4	2:56 PM	7275	Washington, DC	New York, NY	1			
or 4	3:12 PM	9643	Greenbelt, MD	Washington, DC	1			
					<u> </u>			<u> </u>
or 4	3:29 PM	9643	Landover, MD	Incoming, CL	1			
л 4 or 4	3:31 PM	9643	Capitol He, MD	Incoming, CL	5			
л 4	0:01 FIVI	9043	Capitor He, MD	Inconning, CL				
or 4	3:43 PM	7275	Capitol He, MD	Incoming, CL	7			
or 4	3:49 PM	9643	Largo, MD	Washington, DC	3			
or 4	4:01 PM	7275	Greenbelt, MD	Incoming, CL	6			
			,	3,	1			
								1-
					ī			1
								<u>9</u> 7
r 5	1:21 AM	9643	Bethesda, MD	Washington, DC	12			