EXHIBIT 1-B

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner,

v. No. 2:25-cv-00374

DONALD J. TRUMP, et al.,
Respondents.

Declaration of Dahlia M. French, Esq., submitted in support of Petitioner's Motion for Release Under *Mapp v. Reno*

I, Dahlia M. French, declare the following under pain and penalty of perjury:

1. I am over 18 years of age and am fully competent to make this declaration. I have over 25 years of experience as a licensed immigration attorney. I earned my Juris Doctor in 1993, received bar admission in Connecticut (1993) and Ohio (1994) and have practiced immigration and international tax law since 1994. I am also admitted in the US Tax Court and the Federal District Court for the District of Northern Indiana.

2. Since obtaining my license in December of 1993, I have specialized in immigration law, and specifically in academic immigration. I have been a member of the American Immigration Lawyers Association ("AILA") since January of 1998. As a member of AILA, I have served in various volunteer positions, including providing guidance to members on academic immigration issues, through practice advisories, speaking engagements, book chapter contributions, and answering direct questions on listservs. I am currently the Managing Attorney in the law firm French Legal.

3. I practiced in private law from 1993 to 2005, then transitioned to in-house immigration roles at the University of Virginia, Vanderbilt University, and Texas Tech University Health Sciences Center, from 2005 to 2021. With 16 years leading

immigration offices in higher education, I've served as a Designated School Official (DSO), Alternate Responsible Officer (ARO), and Responsible Officer (RO). My immigration law practice focuses on academic, medical, business, and family immigration, with expertise in F-1, J-1, and M-1 visa categories, their derivatives, and institutional sponsorship obligations — including detailed knowledge of the F-1 international student program, the Student & Exchange Visitor Information System (SEVIS), and the laws, regulations, and legal guidance related to SEVIS and international students in F-1 status.

4. I am a sought-after speaker at immigration webinars and conferences, provide expert advice and mentorship to colleagues, and have authored book chapters, journal articles, and practice advisories on academic immigration matters. I am considered a subject matter expert on academic immigration and issues affecting individuals in F-1, J-1, or M-1 visa status and the J-1 Exchange Visitor program

5. As of 2003, all US academic entities who wish to sponsor international students must go through a certification application process (for F and M sponsorship permission) or designation process (for J sponsorship permission). Each visa category has its nuances. F-1 status is available from kindergarten to post-secondary education.

6. SEVIS is the acronym for the Student & Exchange Visitor Information System that is used to monitor and manage persons in F-1, J-1, or M-1 visa status and their dependents.

7. Schools sponsoring F-1 Students must be certified by Student & Exchange Visitor Program (SEVP). As part of the SEVP certification process, schools must designate one employee as a Principal Designated School Official (PDSO) and at least one additional employee as a Designated School Official (DSO). Only the PDSO and DSO (or

multiple DSOs) are given access to the SEVIS database. These international student officials are a primary point of contact for both an F-1 student, and responsible for SEVIS record terminations.

8. After entering the USA, the F-1 student reports to the DSO, enrolls and begins attending school, and the DSO updates the SEVIS record to confirm the student is duly enrolled in a full-time program of study.

9. To maintain visa status, F-1 students must follow specific requirements including: maintaining a full-time course load each semester (with an exemption given for the final semester if less than full-time credits are needed to graduate); refraining from any unauthorized employment and only participating in authorized employment whether on-campus or off-campus; reporting to the DSO before taking any actions that affect the SEVIS record such as dropping to part-time status, taking medical leave, withdrawing from the program, participating in academic internships, and changing visa status; reporting to the DSO at the start of each session or semester or use whatever method the DSO requires to confirm enrollment each semester.

10. F-1 student status continues as long as the nonimmigrant continues to study in the USA. The student's I-94 will have a "Duration of Status" or "D/S" annotation rather than a fixed end date. F-1 status includes all periods of approved post-degree completion employment authorization.

11. US consulates will revoke a visa when they receive information that an F-1 student was charged with a DUI or DWI offense. Consulates rarely provisionally revoke an F-1 visa for any other misdemeanor offenses or derogatory reasons. This is consistent with the Foreign Affairs Manual (FAM) guidance.

12. I know of no time, before April 2025, that a US consulate revoked a visa at the request of ICE, and solely because ICE terminated a SEVIS record. That is because SEVIS record termination has no relationship to visa issuance after a person is in the USA.

13. A visa remains valid even when a SEVIS record is terminated, and students often cure a SEVIS violation by exiting and re-entering the USA using the unexpired visa that was issued to them before SEVIS record termination.

14. In my experience, ICE has never detained a student following SEVIS termination or visa revocation, even if a criminal charge was involved. I know of no situation where ICE has done this when the student is still enrolled in school, or even when the student has withdrawn from school and disengaged from communication with the DSO. Even in the latter scenario, where the former student is clearly in violation, in my experience ICE has not sought out and detained the former student.

15. There is no reason to detain a student who is still enrolled in school. This is because the student would be taking steps to cure the violation, and one of the requirements to curing is that the student remain enrolled as a full-time student. Therefore, it would be inconsistent and harmful for ICE to detain a student who was taking steps to curing a SEVIS termination. This is why ICE does not detain students after a SEVIS violation.

16. I am not a party to this action or proceeding. I am aware of the facts stated herein of my own knowledge, and, if called to testify, I could and would competently so testify.

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Executed on May 2, 2025, Lubbock, TX.

Dahlia M. French, Esq.