

EXHIBIT 1-D

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner,

v.

No. 2:25-cv-00374

DONALD J. TRUMP, et al.,
Respondents.

DECLARATION OF ATTORNEY MAHSA KHANBABAI
SUBMITTED IN SUPPORT OF PETITIONER'S MOTION FOR RELEASE UNDER
MAPP v. RENO

I, Mahsa Khanbabai, declare under penalty of perjury that the following is true and correct:

1. I am an attorney for Petitioner Ms. Rümeysa Öztürk. I submit this declaration in support of the her motion for release under *Mapp v. Reno*.

2. On April 16, 2025 I attended the first Master Calendar Immigration Court hearing for Ms. Öztürk in Basile, LA. The presiding judge, the Honorable Sherron Ashworth and the DHS attorney were present via video.

3. The Immigration Court also held a bond hearing the same day.

4. The only document the Department of Homeland Security (DHS) used in the bond hearing—and indeed, the only documentary evidence it has submitted in the entire immigration record— is a memo dated March 21, 2025 addressed to Andre Watson, Assistant Director, National Security Division, DHS from the Bureau of Consular Affairs, State Department (DOS Memo). This is the same DOS memo that Ms. Öztürk submitted in federal court after DHS had filed it in her immigration proceedings. *See* Exhibit 91 and 91-1.

5. The Immigration Judge made a finding that Ms. Öztürk was both a flight risk and a danger to the community and denied bond.

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

Executed on May 2, 2025, in Baltimore, MD.

A handwritten signature in cursive script, appearing to read "Mahsa Khanbabai", written in black ink.

Mahsa Khanbabai Esq.