

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

RÜMEYSA ÖZTÜRK,
Petitioner,
v.
DONALD J. TRUMP, *et al.,*
Respondents.

Civil Action No. 2:25-cv-00374-wks

**SUPPLEMENTAL EXHIBIT IN SUPPORT OF THE PETITIONER’S MEMORANDUM
OF LAW ON JURISDICTIONAL ISSUES AND PETITIONER’S MOTION FOR
RELEASE UNDER *MAPP V. RENO* OR, IN THE ALTERNATIVE, FOR RETURN TO
VERMONT**

Petitioner Rümeyisa Öztürk files this supplemental Exhibit 12 (redactions applied by Petitioner pursuant to F.R.C.P. 5.2) in support of her supplemental memorandum of law on jurisdictional issues, ECF 81, and her motion for release under *Mapp v. Reno*, or in the alternative, for return to Vermont, ECF 82.

The supplemental exhibit is a March 21, 2025, memorandum prepared by the Department of State in response to an assessment and request by DHS/ICE regarding Ms. Öztürk. Ms. Öztürk’s counsel did not have this Department of State memorandum until it was filed into the record of Ms. Öztürk’s immigration court removal proceedings at 5:38 p.m. Eastern Daylight Time on April 10, 2025, which was after this Court’s 5:00 p.m. deadline to submit supplemental briefing. The government submitted the document in immigration court with the underlined phrase, “the Department of State will not notify the subject of the revocation.”

Ms. Öztürk files this supplemental exhibit as additional support for her argument that release is warranted under both prongs of the *Mapp* inquiry. *See* ECF 82-1 at 9. The exhibit supports the argument that Ms. Öztürk raises “substantial claims” by supplying further proof that

the government's actions with respect to Ms. Öztürk are motivated purely by her protected speech, *see id.* at 11-13, and supports the argument that this case presents "extraordinary circumstances," *see id.* at 15, by providing additional evidence as to the irregular and retaliatory nature of the government's approach in this case, *see id.* at 17-20. Ms. Öztürk also files the exhibit as evidence of the retaliatory nature of her arrest and detention in further support for her argument that this case is properly before the District of Vermont and that Court's review is not barred by the Immigration and Nationality Act. *See* ECF 81.

Respectfully submitted,

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**Pro hac vice application forthcoming*
***Admitted to appear pro hac vice*