

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION**

Salah Salem SARSOUR,

Petitioner,

v.

Brison SWEARINGEN, Sheriff of Clay County,
Indiana; Todd M. LYONS, Acting Director,
U.S. Immigration and Customs Enforcement;
Markwayne MULLIN, Secretary of the United
States Department of Homeland Security;
Marco RUBIO, Secretary of State;
Todd BLANCHE, Acting Attorney General,

Respondents.

**Case No. 2:26-cv-00224-JPH-
MKK**

DECLARATION OF SALAH SARSOUR

I, Salah Sarsour, declare under penalty of perjury that the following is true and correct, pursuant to 28 U.S.C. § 1746:

1. I am currently detained at Clay County Correctional Facility in Brazil, Indiana.
2. For over thirty-two years, I have been a lawful permanent resident of the United States.
3. Since my arrival to the United States, I have resided in Milwaukee, Wisconsin, where I have built my life and raised my family.
4. I have reviewed the amended habeas petition that was filed on my behalf on April 13, 2026. I confirm that it is accurate. I will not restate, in this declaration, all of what was already

said in my petition.

Background

5. I was born on December 22, 1972, in Al-Bireh, near Ramallah, in the Israeli-Occupied West Bank in the Palestinian territories.

6. In addition to being Palestinian, I am also a devout Muslim.

7. On September 28, 1993, I became a conditional lawful permanent resident of the United States, through my entry on an immigrant visa. The conditions on my lawful permanent resident status were removed in 1998.

8. Growing up in the Israeli-Occupied West Bank, I was denied many freedoms.

9. I believed that America was a land of opportunity and freedom, including the freedom of speech and association.

First Unlawful Detention by the State of Israel

10. When I was 15 years old, at approximately 1:00AM, my home was raided by Israeli soldiers while I was asleep on the couch.

11. I woke up with multiple soldiers pointing guns at me.

12. I was handcuffed, blindfolded, and thrown onto the floor of a large transport jeep. During the entire transport, I was being kicked in my back, face, and genital area.

13. I was transported to a military detention site in Al-Arsal, Ramallah.

14. Upon arrival at the detention site, I was thrown out of the jeep onto the ground where I fell on my back. I could not brace myself due to being handcuffed.

15. At the detention site, I was put in an approximately 6-by-12 foot cell with three adults. After a few hours in that cell, I was taken into an interrogation room called “Shabih.” My legs were tied to the chair and my hands were tied to the back of the chair in a way that was

extremely uncomfortable, so I was unable to move at all.

16. In that interrogation room loud noises were played from a sound system where the speakers were next to my ear.

17. I was asked about a number of untrue allegations that they claimed someone told them I did; when I denied the false accusations, two of the soldiers started beating me and violently shaking me causing me extreme pain. That lasted for what seemed like hours.

18. I was physically and mentally abused by Israeli soldiers. The soldiers demanded that I confess to crimes that I did not commit. They threatened to harm me with more beating and the rape of me and my family.

19. I was referred to as an “animal” repeatedly.

20. They threatened to demolish our home and, at one point, showed me a picture of my house which they claimed was a demolition order.

21. I was accused of throwing stones at another human in April and October of 1988 and throwing Molotov cocktails in September of 1988

22. I did not throw stones at another human in April and October of 1988 or throw Molotov cocktails in September of 1988

23. Those allegations are false.

24. The soldiers made it clear that they would not stop abusing me until I confessed to a crime that they wanted to charge me with.

25. These beatings went on for hours each day for about one week to 10 days.

26. After enduring two years of prison for crimes I did not commit, I was finally released in October 1990 at the age of 17.

Arrival in the United States

27. I married my wife Fatina in 1992 and we had a son soon thereafter.

28. I wanted to move my family to the United States to build a better life for myself. I did not want to live in fear of being baselessly arrested or tortured without due process or recourse. I believed that I would be able to live freely and safely in the United States.

29. We arrived in the United States in September of 1993.

30. Not long afterwards, I planned a short trip with my wife and son to visit my family in the West Bank where many of my family remained.

Second Unlawful Detention by the State of Israel

31. On October 14, 1994, as I was returning to the United States from the West Bank with my four-month-pregnant wife and one-year-old child, I was arrested at the Ben Gurion airport by Israeli military authorities.

32. I was only 22 years old.

33. I was taken from my pregnant wife and child and detained in Moscovia Detention Center. My family did not know where I was being held.

34. There, I was placed in solitary confinement for 90 days, I was tortured both physically and psychologically for 78 days straight.

35. The torture of 78 days happened during “interrogation” sessions, in which Israeli soldiers would demand that I confess to crimes I did not commit. I was often beaten between my legs, and I often fainted.

36. I refused to confess to crimes that I did not commit. As a result, Israeli authorities beat me every day, often until I fell unconscious.

37. During my detention, Israeli authorities deprived me of food, sleep, and water.

38. The little food I was provided was spoiled or old.

39. I was only allowed three hours of sleep every 48 hours.

40. My hands were often tied behind my back, and I was forced to sit or hang in stress positions.

41. The torture was physical and psychological. I was forced to listen to loud noises for prolonged periods of time, including sounds of people screaming.

42. As a result of the inhumane conditions I was subjected to, I became seriously ill. I lost over 40 pounds during my detention.

43. I was not allowed to change or shower for 40 days of solitary confinement.

44. I was often placed in a cell without a toilet. When I needed to use the toilet, I was placed in a filthy cell with a hole in the ground.

45. I was only offered a small pitcher with which to clean myself. This was the same water pitcher from which I was also required to drink, forcing me to choose between bathing or drinking.

46. During this ordeal, neither I nor my family knew how long I would be detained for, as I was held in administrative detention, which meant that I could be held for six-month periods which could be indefinitely renewed without charge or trial.

47. At some point during my detention, I understand that my wife called the U.S. embassy for help. I believe that an official from the United States Embassy attempted to visit me, but they were denied access to me. I believe that this was due to the terrible condition that I was in.

48. Eventually, during one of the interrogation and torture sessions, my interrogator handed me a document to sign. The document was written in Hebrew, a language I do not speak.

49. After 78 days of incessant torture and abuse, my health was severely deteriorating,

and I was desperate to do anything that would allow for my release. I wrote my name on the document.

50. After that, the torture finally ended and I was placed in general population.

51. Every criminal allegation lodged against me by the State of Israel is false. I did not commit any of the crimes that I was alleged to have committed.

52. I believe that the arrests by Israeli authorities and the allegations against me in Israeli military court were politically motivated and without any basis.

53. After a total of four months and 25 days, I was taken in front of a “judge,” in what I would liken to a “kangaroo court.”

54. I was ordered to serve one more month and pay a fine, and then I was released.

55. I never went back to the West Bank again. I feared and continue to fear that I will be tortured if sent back.

Building a Life in Milwaukee, Wisconsin

56. After being released, I spent time recovering from my torture at a relative’s home in the West Bank.

57. As soon as I felt well enough to travel, I returned to my home in the United States.

58. After returning to the United States, I tried to rebuild my life.

59. Agents from the Federal Bureau of Investigation (“FBI”) visited me within a month or two after I returned from the West Bank to ask me about my detention and torture.

60. I spoke openly with them about my detention. I also told them about the extreme torture that I endured.

61. The FBI agents followed up with me about my detention and torture two to three times more afterwards. I met with them each time and shared the information I had.

62. In 2014, I shared some of my experiences being tortured in a documentary entitled “The Tortured: Stories of Survival,” directed by Murad Aldin Amayreh. After leaving the West Bank, I believed that I was safe in the United States to speak freely about my experiences as a Palestinian.

63. For thirty-three years, I have lived in the United States peacefully.

64. I have no criminal record in the United States.

65. I currently serve as the President of the Islamic Society of Milwaukee.

66. I also serve on the Board of American Muslims for Palestine.

67. I have been married for 33 years. My wife’s name is Fatina Sarsour, and she is a U.S. Citizen.

68. I have six children and nine grandchildren, with a tenth grandchild expected.

69. They are all U.S. Citizens.

70. I own a number of furniture stores.

71. As the President of the Islamic Society of Milwaukee and a board member of AMP, I am public about my identity as a Palestinian and a Muslim.

72. The last time I left the country was in 1998, when I traveled to Saudi Arabia for Hajj, the annual pilgrimage to Mecca required of every physically and financially able Muslim man.

73. Throughout my thirty-three-year immigration history, it is my recollection that I have maintained a perfect attendance record for all interviews and hearings. The sole exception was a 2002 citizenship oath ceremony, for which I received the notice only after the event had occurred.

74. I am not a flight risk. I am deeply dedicated to my family and community.

Advocacy in the United States

75. I advocate for the rights of Palestinians because I believe deeply in the dignity and humanity of all people.

76. I believe that I was targeted by the federal government on the basis of my advocacy and associations in support of Palestinian rights, my position with American Muslims for Palestine, and on the basis of my identity as a Muslim, Palestinian man.

My Arrest on March 30, 2026

77. On the morning of March 30, 2026, around 9:15AM, I was on the way to work. I stopped by an old building that I used to own to pick up mail.

78. As I exited my vehicle, I saw a car hurtling towards me at a very high speed. This car was driving on the wrong side of the road.

79. I instinctively jumped to the curb of the road to avoid being hit by this car, which may have seriously injured me.

80. Soon after, a plainclothes federal agent jumped out of this unmarked car and pointed his gun at me. He demanded that I identify myself, asking “Are you Salah Sarsour?”

81. I had no way of knowing that this individual was a federal agent. I was terrified, and I genuinely believed that I was going to die.

82. Within moments, I found myself surrounded by 10 or 11 additional unmarked vehicles.

83. Many of these federal agents had their guns drawn, and multiple of them were yelling at me.

84. After a short time, one of the plainclothes federal agents identified himself as an ICE agent. I immediately complied with all of their demands of me upon learning that they were

federal agents.

85. While being arrested, I begged the agents to at least allow me to call my wife to tell her what was happening. I had been planning to take my mother, who is sick and for whom I serve as a primary caretaker, to her doctor's appointment that day.

86. I told the federal agents this, and eventually, one agent called my wife and told her that she was going to have to take her mother-in-law to her doctor's appointment, without giving further explanation.

87. When my wife asked the agent where I was, the agent hung up without answering.

88. I was then thrown into a vehicle and taken to Broadview, Illinois for processing.

89. Agents at Broadview also told me that my best option was deportation and gave me a document to sign to agree to deportation.

90. I refused. My life's work, my wife, my children, my mother, and my community are all located in Milwaukee, Wisconsin. It is my home.

91. While being processed, I also informed ICE agents that I was a Type 2 Diabetic and needed my medication.

92. After being processed at Broadview, I was taken to Clay County Jail in Brazil, Indiana, where I remain to this day.

93. My detention has taken a serious toll on my health and on my family.

94. It has also prevented me from serving the Muslim community of Milwaukee and from continuing my advocacy in support of Palestinian rights.

My Medical Conditions and Deteriorating Health

95. Due to my diabetes, I require three different medications.

96. I have not been getting the medical care I need to survive, and the conditions at Clay County have worsened my medical conditions.

97. I am supposed to have my blood glucose levels checked daily, which does not happen.

98. In addition to worrying about my own health, I worry about how my detention has impacted my mother's health. My mother is elderly and sick. She is currently suffering from dementia and was recently hospitalized for other serious health issues.

99. I serve one of her primary caretakers and frequently take her to her doctor's appointments, as I was planning to do on the day of my arrest and detention.

Effects of the Detention

100. Milwaukee is my home—it is the only home I have known in the thirty-three years I have lived in the United States.

101. As a result of this detention, I can no longer continue my work as a community leader.

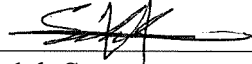
102. I can no longer freely speak on matters of public concern.

103. I can no longer continue my work with AMP, a registered 501(c)(3) with the goal of educating the American public about Palestine.

104. I am unable to work or support my businesses or my family.

105. If this Court was to release me, I would return to my family in Milwaukee, Wisconsin, while my removal proceeding progresses.

I declare under penalty of perjury that the foregoing is true and correct. Executed on April 24, 2026.



Salah Sarsour