

# Exhibit 4

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

BADAR KHAN SURI

*Petitioner,*

v.

DONALD TRUMP, *et al.*,

*Respondents.*

Case No. 1:25-cv-480

**SUPPLEMENTAL DECLARATION OF MAPHEZE SALEH**

1. My name is Mapheze Saleh. I am more than 18 years old, am competent to be a witness, and testify from my own personal knowledge regarding the facts in this Declaration.

2. I am a United States citizen, and I am Badar Khan Suri's wife.

3. At the time I write this declaration, Badar has now been in ICE custody for approximately 55 days. Throughout this entire time, I have been managing my household and three young children alone.

4. Because Badar is incarcerated so far from us, my three children and I have not seen Badar in person even once in the last 55 days.

5. It is very difficult for me to go to the ICE Prairieland Facility in Texas to visit Badar because I have not been able to find childcare to care for my three young children

6. Sadly, my three children have only seen their father once in the past 55 days on a single video call.

7. From my understanding, in his part of the ICE detention center, almost 50 people share a few iPads. It is hard for him to get access and request a video call with us. I have only been

able to video call with him 5 times since he was detained on March 17th. These video calls were limited to 30 minutes.

8. Given how far away he is detained from his family, friends, and community, Badar has only had 3 visitors in the 55 days he has been jailed by ICE. He was visited once by his Program Director at Georgetown University, Prof. Nader Hashmi, once by his legal team, and once by a local imam for a spiritual visit.

9. When Badar was picked up by ICE, I was about to finish my second semester in my Master's program at Georgetown. After Badar was detained, I stopped going to campus for about a month. Even before Badar was detained, I was receiving death threats from individuals who had found my profile on the doxxing website Canary Mission, where my photo had been published. I am afraid now because I am the only parent my kids now have, and I couldn't take the risk that I would be picked up or kidnapped. I felt that for my family's safety and the kids' stability, I needed to stop leaving the house for my classes and not take any risks. Though my professors allowed me to attend classes via Zoom, it was difficult for me to engage in class, find time to do my assignments between caring for my three young children full-time, and to mentally focus on academics while my husband is incarcerated.

10. The news of Badar's arrest by ICE and the allegations the U.S. government brought against him led me to be stigmatized by many of my peers and community members. I felt that people didn't want to associate with my family. People said they didn't want to be seen with me on campus. I am grateful for the small circle of friends who have tried to support me and my children.

11. My kids ask me about their father day and night. I still cannot bring myself to give our young twins a real answer about where their father is.

12. Our 9-year-old son has been affected the most. He is especially close to his father, Badar. To him, Badar is more than just a father; he is his friend, and they share everything together. However, now that his father is inaccessible and detained by ICE, he is unable to open up to anyone. It has been hard to watch my eldest child, who used to speak prolifically, go silent and struggle to string together a single statement.

13. I've requested that our eldest son see the school social worker for therapy while we seek a regular therapist to help him process his father's absence. I have yet to find an in-person therapist. He is very worried about his classmates finding out about his father's situation.

14. Turning to myself, it is hard for me to function mentally. I am overwhelmed by too many responsibilities: my own academic responsibilities, supporting my children, emotionally supporting Badar, all while managing our household financially and logistically, as well as my husband's legal case and the prospect of his long-term detention.

15. To add to this, my own family faces ongoing genocide in Gaza. I am unable to turn to any of them for regular support, much less support them through their own devastating plight. I feel myself going into deep depression.

16. I feel especially bad because Badar needs support now more than ever, but I am so frustrated from the burdens of the day that I usually end up meeting him in anger and frustration.

17. Since Badar's visa was revoked and he has been incarcerated, I needed to start earning money. I had to get a part-time job so we could make ends meet. I am unable to afford health insurance for myself and my children. I am working hard to save enough money to stay in our current apartment, as I want us to remain close to my children's school.


18. As summer approaches, I hope I can enroll my children in summer camp. Without Badar, it is hard for me to afford these programs, and I am trying to apply for aid and fee reductions wherever possible.

19. As my husband doesn't have access to regular, nutritious food or even a basic bed at the detention center, it's hard for me to find any enjoyment in life, such as ordering a nice meal for my children or finding enjoyment in leisurely activities. I have learned that Badar's blood work in detention has been irregular because he is not receiving enough access to protein. He asked me for extra funds so he could afford additional protein, I believe tuna. He said that the food is not even sufficient for a "cat."

20. Finally, Badar's detention is having a devastating impact on his own parents in India. His father has had major cardiac issues since Badar's detention and has needed immediate medical care. Badar's parents sob through each of my phone calls with them. I am very concerned about the impact of Badar's detention on Badar's father's mental and physical health. In the limited time I am able to speak to Badar, I oftentimes try to connect him with his elderly parents in India.

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

Executed on: May 12, 2025

By:   
Mapheze Saleh