

# **EXHIBIT B**

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

BADAR KHAN SURI

*Petitioner,*

v.

Case No. 1:25-cv-480

DONALD TRUMP, *et al.*,

*Respondents.*

**DECLARATION OF SANDRA GALIB**

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

1. I have personal knowledge of the contents of this declaration or have knowledge of the matters based on my review of information and records obtained in the regular course of business.

2. I am an Associate Director for International Scholar Services in the Office of Global Services at Georgetown University. I am the Responsible Officer (RO) overseeing the administration of Georgetown's J-1 Exchange Visitor Program, and have held that designation since at least 2015. I have worked in this field in various positions for nearly 30 years and have served in my current role since 2010. I have been employed in Georgetown's Office of Global Services since 1999 and have been an Alternate Responsible Officer or Responsible Officer throughout that period. Between 2006 and 2010, I was the Director of International Student & Scholar Services.

3. In my current position, I am responsible for overseeing Georgetown's J-1 exchange visitor program. I have access to and maintain J-1 exchange visitor records in the Department of

Homeland Security's Student and Exchange Visitor Information System (SEVIS). I oversee the Alternate Responsible Officers who process and advise J-1 exchange students and scholars, I am responsible for providing incident reports to the Department of State when necessary, I file the required annual reports with the Department of State regarding our J-1 program, and I file our program's redesignation every two years. For the period of July 1, 2023 to June 30, 2024, Georgetown hosted around 260 J-1 scholars overall.

4. On March 18, 2025, I learned that Badar Khan Suri, a Georgetown research scholar from India on a J-1 visa, had been taken into custody by the Department of Homeland Security the night before. Through a subsequent review of Dr. Khan Suri's Student and Exchange Visitor Information System (SEVIS) record, I learned that the record had been terminated by "DOS Official" on March 18, 2025 at 8:52 a.m. for the stated reason of "No Show." The reason was modified at 9:19 a.m. to "Other – Failure to Maintain Status." The SEVIS record contained no other information about the reason for the termination.

5. Prior to the night of his arrest, Dr. Khan Suri's SEVIS record was in active status. His participation in the program had been approved through December 31, 2026.

6. A screenshot of the Event History page of Dr. Khan Suri's SEVIS record, which I took on March 18, 2025, shows the March 18, 2025 SEVIS termination by the State Department official, with the stated reason for termination.

7. My review of Dr. Khan Suri's SEVIS record also revealed that the SEVIS records of his three children, who were in J-2 status under Dr. Khan Suri's J-1 status, had been terminated on March 15, 2025 for the stated reason, "Terminated When J-1 Was Terminated".

8. No other changes have been made to Dr. Khan Suri's SEVIS record since I viewed it on March 18<sup>th</sup>.

9. To date, I have not received any notification or communication from the Department of State or the Department of Homeland Security regarding the termination of Dr. Khan Suri's SEVIS record or the reasons for the termination, other than what is shown in the SEVIS Event History page.

10. After I learned that Dr. Khan Suri had been detained and saw that his SEVIS record had been terminated, I submitted an incident report to the Department of State on March 19, 2025 reporting that Dr. Khan Suri had been detained. I received a response stating that they were sorry to hear about the incident and asking to keep them updated on the situation.

11. Prior to Dr. Khan Suri's arrest, he had maintained his J-1 status, and neither I nor anyone else at Georgetown's Office of Global Services had provided any information to the State Department or Department of Homeland Security that would have resulted in a termination of his status under the regulations.

12. In my 25 years in Georgetown's Office of Global Services, I had never seen a J-1 SEVIS record terminated unilaterally by the State Department in this manner until Dr. Khan Suri's. Normally, if a J-1 exchange visitor has failed to maintain status, it would be our obligation to terminate the SEVIS record; the termination would not be done by the State Department. No other Georgetown J-1 exchange scholar has had their SEVIS record terminated unilaterally by the State Department this year.

13. My understanding is that when a SEVIS record is terminated, that reflects that an exchange scholar or student's status has been terminated. My understanding is also that if an exchange scholar's SEVIS record has been terminated, they are no longer permitted to work or participate in their program. As a result, Dr. Khan Suri cannot resume teaching or participating in his fellowship program unless and until his SEVIS record is reinstated.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: 6/2/2025

DocuSigned by:  
By: *Sandra Galib*  
Sandra Galib  
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