IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

BADAR KHAN SURI

Petitioner,

Case No. 1:25-cv-480

v.

DONALD TRUMP, et al.,

Defendants.

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. I was born in Missouri in 1990 and lived in the United States as a young child. I moved to Gaza when I was five years old, and that is where I was primarily raised. However, I returned to the United States every summer to see my father until I was approximately 13.

4. My father lived in the United States for approximately 20 years while pursuing a master's and Ph.D. Afterward, he served as political advisor to the Prime Minister of Gaza and as the deputy of foreign affairs in Gaza. He left the Gaza government in 2010 and started the House of Wisdom in 2011 to encourage peace and conflict resolution in Gaza. He has been at the House of Wisdom since then and is also a professor of International Relations at the Islamic University of Gaza.

5. I completed my undergraduate studies at the Islamic University of Gaza, where I studied journalism. I received my first master's degree in Peace and Conflict Resolution at Jamia Millie Islamia University in New Delhi. I am currently enrolled in a master's program in Arab

studies at Georgetown University in Washington, DC. Prior to the war in Gaza, I often worked as a freelance journalist for Middle Eastern newspapers and media outlets, reporting on politics in Palestine and India.

6. My husband, Badar, is an Indian national who grew up in Uttar Pradesh, India. I met Badar around 2011, when he was visiting Gaza with an international humanitarian convoy to Gaza. Badar was a master's student in Peace and Conflict Studies at the Nelson Mandela Center for Peace and Conflict Resolution from Jamia Millia Islamia in New Delhi. He was to travel to a conflict area as part of that program. At the time, I was working in the Foreign Ministry of Gaza as a translator for foreign delegations that visited Gaza, and I served as a translator for his convoy. During that trip, his convoy met with my father, who was the head of an institute called the House of Wisdom that worked on peace and conflict resolution.

7. Around 2012 or 2013, Badar returned to Gaza to ask for my hand in marriage and to seek my father's blessings to do so. Badar has only met my father on those two occasions and hasn't seen him since.

8. I moved to New Delhi in 2013, and Badar and I got married and started our family. We had three children while we were living in New Delhi and remained there while Badar completed his Ph.D. in Peace and Conflict Studies from the Nelson Mandela Center for Peace and Conflict Resolution at Jamia Millia Islamia. From there, we moved to the U.S. Badar never returned to Gaza.

9. Life was difficult in New Delhi. I felt that job opportunities were limited for Palestinians and particularly for women who wore hijab. As a result, we wanted to come to the United States because of its reputation for free speech and religious freedom.

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10. Badar applied for and received a postdoctoral fellowship at Georgetown University at the Alwaleed Bin Talal Center for Muslim-Christian Understanding. In late 2022, he came to the United States on a J-1 visa to start his fellowship, for which he is researching obstacles to cooperation among religiously diverse societies and ways to overcome those obstacles. This semester, he is teaching a class on majoritarianism and minority rights in South Asia. I came with the children the following year, in November 2023.

11. When Israel began its genocide in Gaza in October 2023, I felt like I had an obligation to share information about what was happening and to speak out, including because of my background in journalism and my Palestinian heritage. As a result, I shared posts on a daily basis about things I had seen that were happening in Gaza, including posts that expressed sorrow for the deaths of Gazan people.

12. In February of this year, I learned that certain websites online had targeted me personally because of my father's former role in the Gaza government, and because of my social media posts. Multiple articles were published about me and my family, and eventually about my husband. A website claimed falsely that my husband and I have "ties to Hamas." People began attacking us online, and I began receiving threatening messages on social media indicating that people were going to target me, including in person at my campus. I began to feel unsafe after this and asked other students to escort me when I walked around campus, especially after hours.

13. On Monday, March 17, I waited for Badar to return home from teaching courses and attending iftar at Georgetown. At approximately 9:20 pm, I received a call from Badar saying that police were arresting him outside our apartment and to come fast. When I came downstairs, I saw three uniformed, masked agents who were in the process of handcuffing Badar and placing him in a large black SUV. Badar told them he had done nothing and asked why they were taking him away. They did not answer any of his questions and placed him in their car. I also asked them who they were, and they responded that they were from Homeland Security. I asked why they were taking him, and they said that the government was revoking his visa and that they would be taking him to Chantilly. Badar asked me to get his passports and immigration documents, and I asked them to wait while I did so. When I returned and tried to hand him his documents, they would not let me do so, and instead took them from me themselves. I watched him being driven away with no idea why he had been arrested.

14. Two hours later, I received a call from Badar from one of the agents' phones. He told me he was going to be transferred to a detention center three hours away, and that he had a hearing scheduled in Texas on May 6. He informed me that he was being held under Section 237 (a)(4)(C) of the Immigration and Nationality Act.

15. On the night of March 18, 2025, I received a call that turned out to be a recording from Badar that lasted only a few seconds. In the recording, he told me only that he was in Louisiana. I heard from him again in the early morning of March 20, 2025, when he asked me to call him every day because he worried about me and our children. He told me he wished he was with me and our family during the holy month. He also said that he hasn't been able to get his meals in accordance with his fasting schedule for Ramadan.

16. I am worried for him and his health. He occasionally takes medications for gastroesophageal reflux disease, and the lack of medications during an episode of reflux can cause him to experience severe pain throughout his body.

17. Since his arrest, I have been under extreme stress. I miss and worry for him dearly.I have not been able to sleep. We are fasting for Ramadan, so I was already feeling weak, and this

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made me feel even worse. I feel completely unsafe and can't stop looking at the door, terrified that someone else will come and take me and the children away as well.

18. Our children are in desperate need of their father and miss him dearly. They keep asking about him and when he will come back. I cannot bring myself to tell them what has really happened to him, although my eldest child understands he is in some kind of trouble.

19. As a mother of three children, I desperately need his support to take care of them and me. We are almost entirely dependent on Badar for our income. I can no longer attend my classes at Georgetown because I do not have Badar here to help care for our family. I cannot even go to the grocery store because I cannot leave the children by themselves. This experience has completely upended our lives. I implore this Court to permit him to return home to me and his three children.

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

By:

Executed on: March 20, 2025

Mapheze Saleh