

Exhibit 1

**IN THE 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

DECLARATION OF BADAR KHAN SURI

I, Badar Khan Suri, under the penalty of perjury declare as follows:

1. I am over the age of 18, am competent to give this declaration, and testify from my own personal knowledge regarding the facts in this declaration.

2. On Monday, March 17, 2025, I was returning to my apartment in Rosslyn, Virginia around 9:30 pm, after teaching courses and attending iftar, a meal to break my fast during Ramadan, at Georgetown University, where I work.

3. As I approached my apartment building, I noticed a dark-colored SUV driving dangerously, as well as several other unmarked, black cars driving to my building. As I was about to enter my building, a man wearing grey clothing and a mask covering his nose and mouth emerged from one of the cars and blocked me from entering my building.

4. The man asked me if I was Badar, and I told him I was. He told me I was under arrest and my student visa had been revoked. I told him I did not have a student visa, but an exchange visa. He said it was the same thing and that it was also revoked.

5. I was terrified and shocked, and thought there must be some mistake. I repeatedly asked him why I was being arrested, but he did not tell me.

6. At that point, I called my wife, Mapheze Saleh, who came downstairs from our apartment. She and I both asked why I was being arrested, and where I was being taken. Eventually, the man and a fellow officer informed us that I was being taken to Chantilly, Virginia. They told me nothing else about where I would be detained at that time.

7. The officers then drove me away. During the car ride, when I asked why I was being arrested, an officer told me that I would find out later, but eventually he told me that “someone high up in the Secretary of State’s office doesn’t want you here” so my visa was being revoked. I asked him, why? He said, it may have had to do with social media.

8. The agent then told me I was going to be deported from the United States to the country where I am from. When I asked when I would be deported, he said today.

9. When we arrived at our destination, which I understood to be Chantilly, Virginia, I was taken into a building where I interacted with two officers who took swabs of my cheeks, did my finger scan, and gave me some paperwork. The paperwork included a document that listed the immigration allegations against me and indicated that I had a hearing in immigration court in Texas on May 6, 2025. I asked him why the document had a Texas address and why the hearing was in May. He responded that it was just computer generated, and it might be changed later on.

10. After a few minutes, they took the paper with my immigration charges and court information away, and I did not see it again until I reached Texas.

11. As the officers were speaking to me, they were looking at a computer, and at one point one of the agents said, “this is his wife.” When I heard that, I responded, “you have her records as well?” His response was, “No, that’s not for you.” A second later, he pointed at his computer and said to the other office, “that’s him.”

12. The officer then told me that they needed to take me to Farmville, Virginia, which was three hours away. I asked them if I could be kept closer to my family, and they told me that that might be possible later on, but that it was late and Farmville was the only option.

13. The ICE officers allowed me to call my wife to inform her that I was being taken to Farmville and that I had a hearing in an immigration court in Texas on May 6.

14. I was then driven to the Farmville Detention Center in Virginia, where I was placed in a cell by myself. I asked to call my wife, but I was refused. I was taken to the nurse for tuberculosis testing, and I asked her if I would be staying in my current cell. The nurse told me I would be moving to a dormitory. I believed that I would be living there for some extended period of time, or until I was brought home or closer to home, because I was told so by the officer at Chantilly.

15. But then, after a few hours, I was taken out of Farmville, and driven to another location that I was told was in Richmond, Virginia. I thought I was going to be placed in detention in Richmond because it was closer to my family. When I arrived at this new location on the morning of March 18, I was made to sit on a small bench in a locked cell, shackled, and was denied food and water, despite repeated requests, and despite informing them repeatedly that I could not eat after sunrise because I was fasting for Ramadan. I was not told why I had been taken to this new location. I asked for a chance to call my wife and update her with my location, but I was denied.

16. Several hours later, I was removed from my cell and put in a van, still shackled, and driven away again. When the officer removed me from my cell, I asked him where I was going. He said he was not supposed to tell me. No one would tell me where I was going, despite my repeated inquiries.

17. After an hour or so, we arrived at an airport, and I was put onto an old airplane along with around 300 other people. We were shackled the entire flight, even when we used the bathroom. I did not know which airport we were in or where I was going. I was afraid that I had been put onto a deportation flight and that the flight was leaving the country. Another detainee sitting near me on the airplane said in broken English that he thought we may be flying to Louisiana, but no officer confirmed this.

18. At some point in the late afternoon or early evening of March 18, the plane landed. I did not know where I was, but I later gathered that I was in Louisiana when I arrived at a large detention center. I was not processed or booked until several hours after landing in Louisiana, either late at night or early morning of March 19. I was brought to a room and made to stand in line until an employee gave me a paper printout containing my photo, A number, and a field for security classification. My security classification field was blank.

19. While I was at the Louisiana facility, I asked repeatedly to call my wife. In response, the officers just pointed to a phone that was on a wall. But a code was needed to operate it, and I did not have one and did not receive one until I was later brought to Prairieland Detention Center. The system had an option to place a free call for a few seconds, without a code, but when I tried to call my wife, I could hear her voice, but she could not hear mine and I could not communicate with her. There was no option whatsoever to make confidential attorney calls.

20. While I was in Louisiana, I was sure I was to be deported very soon. I heard a senior officer say that the place I was staying was a “super deportation center.” It felt like the officials were trying to get me out of the country quickly before my family could find me or a judge could stop my deportation.

21. On the night of Thursday, March 20, an officer told me and two other men that we were going to be transferred to New York the next day, which I believed meant I was being deported.

22. Then, on the morning of Friday, March 21, I was told by an officer that I was being sent to Texas by bus. I was not allowed to call my wife to tell her I was being moved again. I did not learn that the judge in my case had issued an order preventing my deportation until after I was in Texas, when I had my first confidential legal call. At Prairieland Detention Center, I was not given a bed to sleep in, despite requesting one repeatedly, for almost two weeks. Instead, I slept on the floor in a room with a television blaring at all hours except between 2 a.m. and 5 a.m. I understand this is because of capacity problems in the Prairieland Detention Center. The capacity of my current dorm is 36, but there are constantly more than 50 people here. There are always about 15 or more people sleeping on the floors because there aren't enough beds.

23. I now have a bed and, as of April 9, a pillow, but it is still difficult to sleep because of the constant noise and the lights. Most of the lights turn off at 11, but there is an overhead light with around nineteen bulbs that never turns off, directly over my bed.

24. We are permitted to go to outdoor recreation for only 2 hours a week. Otherwise, the only fresh air we get is in a fenced-in cage, about 35 by 18 feet or so, that gets extremely crowded. We have been issued old, used undergarments. There is no privacy. The bathrooms are inside the dorm, without any partition between the sleeping area and the bathroom stalls. The stalls themselves are very short so you can see everyone else while using the facilities. We don't have a kitchen, so we clean our dishes in the bathrooms. There is no place for me to pray and I have been denied religious accommodations despite asking. There is no library, except for a bookshelf containing only bibles. I feel like we are living like animals.

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

Executed on the 15th day of April, 2025.

/s/ Badar Khan Suri
Badar Khan Suri

I, SOPHIA LETICIA GREGG, declare as follows:

1. My name is Sophia Gregg. I am a licensed attorney in good standing in the Commonwealth of Virginia. I am an attorney of record in the above-referenced case.
2. I represent the Petitioner, Badar Khan Suri.
3. I signed Dr. Khan Suri's declaration on his behalf with his express consent, after reviewing it with him, as reflected in his declaration.
4. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 15th day of April 2025

/s/ Sophia Gregg
Sophia Leticia Gregg