

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
SOUTHERN DIVISION**

EBLAL ZAKZOK, *et al.*,

*Plaintiffs,*

v.

DONALD TRUMP, in his official  
capacity as President of the United  
States, *et al.*,

*Defendants.*

Civil Action No.: 1:17-cv-02969-GLR

**DECLARATION OF JANE DOE #2**

I, [REDACTED], known as Jane Doe #2 for the purposes of this case, to the best of my knowledge, information and belief, hereby submit this declaration pursuant to 28 U.S.C. §1746 and declare as follows:

1. I am a United States citizen and a resident of Maryland. I am also Muslim.
2. My parents are both Syrian. They moved to Kuwait in the 1980s, before my birth. They remained there until the invasion of Kuwait by Iraq in 1990. At the outset of the war, they returned to Syria to escape the violence. I was born in Syria during that time.
3. After the conclusion of the war, my father quickly returned to Kuwait to begin rebuilding. He is an educator, and resumed his work as a teacher. My father has not been back to Syria in the more than twenty-years since then.

4. My mother took me, along with my brother, back to Kuwait in the mid-1990s.

5. I began my university studies in architecture in Syria. At that time, I planned to complete my education in Syria and get married after I graduated.

6. My plans changed in 2011, when the Syrian Civil War began. Fearing for my safety, I returned to Kuwait briefly to stay with my parents.

7. I then traveled to the United States to meet my fiancé. We married in 2011. I resumed my study of architecture and graduated with a Bachelor of Science degree.

8. My husband and I now live in Maryland with our three-year-old son.

9. In June 2016, my mother, who was then in Kuwait, came to the United States visit and later decided to stay with my family and help us raise our child. My mother is now a lawful permanent resident.

10. When my mother came to the United States, my father remained in Kuwait. He continued to work as a teacher, and he and my mother relied on his income. My father has visited us in the United States, and has met his grandson, but his visits have been brief.

11. My husband and I are now expecting our second child. Financial circumstances will now permit my father to join us in the United States. He hopes to spend time with his grandchildren and to help raise them.

12. Earlier this year, I submitted an I-130 Petition on behalf of my father. The petition was approved, and my father has begun his visa application. He has not yet been interviewed.

13. I understand that if the Proclamation goes into effect, my father would be barred from coming to the United States indefinitely.

14. It is very important to me and my family that my father be able to join us in the United States. I want my children to know both of their grandparents, and to learn from them. My father would speak to my children in Arabic, teaching them both the language and our culture in a way that my husband and I cannot. It is very important to us that our children be bilingual, understand their culture and history, and have a close, personal relationship with their grandparents.

15. My son and my father speak with each other using video conferencing software, but these interactions cannot replace the experience of being together face-to-face.

16. My husband and I are both very involved in our community. We are vocal members of the Syrian American Council, which advocates for freedom for the Syrian people.

17. We are also both fully involved with a local child-centered school for children of ages five and younger. We teach at the school and do administrative work to facilitate its operation. Our young students learn about art, culture, and diversity. My mother has also become involved with the school since her arrival. I hope that my father will be able to join us and contribute to the school as well.

18. My work with children has reinforced my belief in the importance of family. Children benefit emotionally and psychologically from being with their family, and it is very damaging if they are disconnected from them.

19. I also fear for my father's safety if he is not able to come to the United States. My father's immigration status in Kuwait depends on his continued employment. As he approaches retirement, there is a risk that he will no longer be able to stay in that country.

20. If my father has to leave Kuwait and cannot come to the United States, the only place he could go would be Syria.

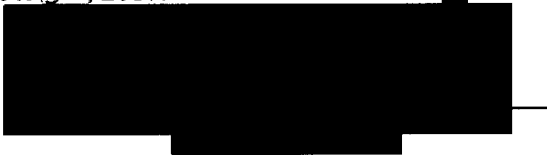
21. Because of my husband's and my political involvement with the Syrian American Council, I believe that my father would be at grave risk if he were forced to return to Syria. I fear that he could be detained, tortured, or even killed.

22. I have now lived in the United States for approximately six years. The President's Proclamation, and the Executive Orders that preceded it, make me feel that I am discriminated against, despite the fact that I am now a citizen.

23. I believe that the Muslim ban is unconstitutional and unfair. It will hurt a lot of people and separate a lot of families. The Constitution is supposed to protect people, and to protect minorities. The Proclamation would make it so that my family could not be together. It would hurt Americans—me, my husband, my son, and my unborn child. This is not what the Constitution is about.

24. I have requested to remain anonymous in this lawsuit because I am afraid that my participation in this lawsuit might harm my father's visa application.

I declare under penalty of perjury that the foregoing is true and correct. Executed at Columbia, Maryland on October 9, 2017.

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