

Exhibit 4

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

IRANIAN ALLIANCES ACROSS BORDERS;
et al.

Plaintiffs,

v.

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

Defendants.

Case No. 17-cv-02921-TDC

DECLARATION OF JANE DOE #3

Pursuant to 28 U.S.C. § 1746, I, [REDACTED], known for the purpose of this case as Jane Doe #3, hereby declare and state as follows:

1. I am over the age of eighteen years, and I make this declaration based on my own personal knowledge. If asked to do so, I could testify truthfully about the matters contained herein.
2. I am a dual citizen of the United States and Iran.
3. I first came to the United States as a student in 1995. I became a US citizen in 2004.
4. I currently live in Potomac, Maryland with my husband, and we have two adult twin boys. We first met while I was a student, and were married in August 1995.
5. I am employed as a special education teacher for Montgomery County Public Schools, where I have worked since 2006. I earned a Master's degree in Education from George Washington University in Washington, DC.

6. After I became a U.S. citizen in 2004, I completed and filed I-130 petitions for my two brothers, mother, and father in October 2004. My oldest brother is now a U.S. citizen; my mother is a U.S. citizen; and my father is a Lawful Permanent Resident.

7. My youngest brother is the only one in our family who is still in Iran awaiting final approval of his pending visa application. The I-130 application was approved in late 2005. Because the waiting process for siblings is very long, my brother had been waiting his turn since that time. In May 2017, we finally received a letter saying that my brother's application is ready for processing, and that an interview should be scheduled soon. A few months later, they asked us to resubmit one of the documents in support of his application, and we did that in September 2017, at which point we were informed that his interview should be scheduled soon. After many long years of waiting, we were finally approaching the end of the process.

8. I am aware of the September 24, 2017 Presidential Proclamation banning most travelers from Iran. If it goes into full effect on October 18, I understand that my brother's application will no longer move forward and he will not be issued an immigrant visa. He will be prevented from entering the United States and rejoining his family.

9. The ban on my brother has caused me a great deal of uncertainty, and I have been confused, disheartened, and extremely disappointed about the third iteration of the ban on Muslims and Iranians. I fear that my brother will remain separated from the rest of my family, who all live with me in the United States. He is the only one left in Iran, and we are eagerly awaiting the time when he can come and be reunited with us. I also fear that the Proclamation will result in more hatred and attacks against my community, and I fear for my safety and the safety of my loved ones.

10. It is important for me to remain anonymous in this lawsuit. I am aware of increasing hostility against Iranians and Muslims in the United States. I am also aware of a significant rise in hate crimes against people who are or are perceived to be Muslim, and I fear for the safety and well-being of my family and myself. I am also afraid of retaliation against my brother in the form of a pretextual denial of his visa applications. I wish to remain anonymous in order to protect myself and my family members from these harms.

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

Executed on October 5, 2017.

