

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Pars Equality Center,)	
Iranian American Bar Association,)	
National Iranian American Council,)	
Public Affairs Alliance of Iranian Americans,)	
Inc. <i>et al</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Civil Action No. _____
)	
Donald J. Trump, President of the United States,)	
<i>et al.</i>)	
)	
)	
<i>Defendants.</i>)	

**DECLARATION OF THE PUBLIC AFFAIRS ALLIANCE OF IRANIAN AMERICANS
IN SUPPORT OF PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Leila Golestaneh Austin, hereby declare and state as follows:

1. I am over the age of eighteen years. I have personal knowledge of the facts set forth herein or believe them to be true based on my experience or upon information provided to me by others, and am competent to testify thereto.

I. Background Information for the Public Affairs Alliance of Iranian Americans (PAAIA)

2. I am the Executive Director of the Public Affairs Alliance of Iranian Americans (PAAIA). PAAIA, Inc. is a 501(c)(4) nonprofit, bipartisan, non-sectarian, national membership organization with an affiliated 501(c)(3), IA-100, Inc. I have been the Executive Director at PAAIA since February 1, 2015.

3. Because of my position as Executive Director, I know about the history and background of PAAIA as well as the organization's mission and purposes. I am also involved in the day to day operations of PAAIA, and thus am very familiar with our current expenses and resources. I oversee the programs and activities sponsored by PAAIA and am either involved directly or indirectly with the publications PAAIA releases or otherwise contributes to.

4. The 501(c)(3) of PAAIA has an exclusive membership comprised entirely of Iranian Americans. All of the approximately 50 members of the PAAIA 501(c)(3) are either U.S. citizens or legal permanent residents and almost all reside in the United States. Membership in the 501(c)(3) is by invitation and invitees are individuals who have demonstrated leadership in their respective fields, are active in the Iranian American community, and are willing to commit their resources in the promotion of PAAIA's goals and programs.

5. The 501(c)(4) of PAAIA also has members who register online with the organization. Members can elect online to register for either the free membership, the \$100 Supporters members, the \$1,000 Ambassador's Circle, the \$2,500 Congressional Club membership, or the \$5,000 National Leadership Circle membership. In addition, PAAIA has 18,645 individuals on our mailing list who receive our communications, 8,452 of whom have signed up under the free membership program and have the option to donate to certain programs.

6. As explained in more detail below, PAAIA engages in many programs and activities which are developed and implemented by a staff located in Washington, D.C. Currently there are three full time PAAIA staff members, including myself, and two part-time university students working as staff members.

II. Mission & Purpose of PAAIA

7. PAAIA was founded to represent and advance the interests of the Iranian American community, which is estimated to be a population approaching one million people, a large portion of which are citizens or permanent legal residents. Iranian Americans are patriotic and have served in all branches of the military and many have dedicated their lives to public service. Working in tandem with the community at large and with other organizations, PAAIA has effectively promoted the role of Iranian Americans in the social, cultural, and economic tapestry of the United States. Serving the interests of Iranian Americans and representing the community before U.S. policymakers and the American public at large, it works to foster greater understanding between the people of Iran and the United States, expand opportunities for the active participation of Iranian Americans in the democratic process at all levels of government and in the public debate, and provide opportunities for advancement for our next generation.

8. Since its inception in 2008, PAAIA continues to carry out its mission by engaging in programs and activities throughout the United States to benefit Iranian Americans and promote a positive image of Iranian Americans. For example, PAAIA has implemented programs such as Passing the Torch of Success, the Nowruz Project, Nowruz on Capitol Hill, Cyrus Cylinder Tour at the Asian Art Museum in San Francisco, and A Thousand Years of the Persian Book at the Library of Congress in Washington, D.C., all of which portray a more accurate image of the Iranian-American community to the general public, policymakers, and lawmakers.

9. PAAIA also fights discriminatory and harassing treatment towards Iranian Americans and stands up for the rights of Iranian Americans by working on issues such as addressing inflammatory remarks about Iranians made by a retired Stanford faculty member;

ensuring that the professional networking website, LinkedIn placed Iran back on their education drop-down menu from where it had been removed; and working with the American Values Network (AVN) to have them drop an anti-oil ad campaign that targeted Iran in favor of a new concept that promotes clean energy but shields innocent Iranians and Iranian Americans from a bad image. In more recent years, PAAIA has written to Chancellor Kumble R. Subbaswamy, of the University of Massachusetts, Amherst, expressing disapproval of the University's new policy which banned Iranians from enrolling in graduate engineering programs; sponsoring a letter signed by 37 prominent Iranian Americans urging the 2016 presidential candidates to refrain from broad generalizations about the Iranian people when discussing the prospective nuclear agreement taking shape between the P5+1 and Iran. In 2015, PAAIA launched a National Communications Campaign to inform the general public as well as U.S. lawmakers about the Iranian-American community's broad support for the Iran Nuclear agreement.

10. PAAIA also continues to educate the general public, lawmakers, and policymakers about the Iranian-American community. For example, in May 2014, PAAIA released a report, "Iranian Americans: Immigration and Assimilation," available through PAAIA's website at <http://www.paaia.org/CMS/Data/Sites/1/pdfs/iranian-americans---immigration-and-assimilation.pdf>, the first in a series of three reports providing more in-depth information about Iranian Americans, which discussed among other things the three major waves of Iranian immigration to the United States, self-identification of the Iranian American community, and typical benchmarks of assimilation. As another example, in June 2015, PAAIA released its 2015 Survey of Iranian Americans, which was presented in a congressional briefing and released to the public at large in connection with a panel discussion hosted by PAAIA on the Iran nuclear negotiations. PAAIA's annual Survey of Iranian Americans is available at

<http://www.paaia.org/CMS/survey-of-iranian-americans.aspx>. These are just a few examples of the numerous publications about and on issues concerning Iranian Americans that are released by PAAIA every year.

11. Because one of PAAIA's key initiatives is leadership-building, PAAIA operates a number of youth programs to encourage future Iranian American leaders. PAAIA's youth programs include sponsoring public service fellowships for Iranian Americans throughout the United States and helping young Iranian Americans obtain internships with legislative offices in Washington D.C.

12. PAAIA has been featured in national and international print and online news media. The organization writes news articles and monitors the media reports on Iranian Americans. PAAIA is also viewed by Iranian Americans as a source of information about issues impacting the community.

III. PAAIA's Promotion of the Iranian American Community

13. According to PAAIA's 2014 report on Iranian Americans: Immigration and Assimilation, while the first known Iranian American, Mirza Mohammed Ali (better known as Hajj Sayyah, "The Traveler") arrived in the United States in approximately 1867, the first wave of Iranian immigration to the United States did not occur until the 1950s. PAAIA's report explained that most Iranian Americans arrived in the United States during the second wave of migration from 1979 to 2001 and were fleeing oppression in Iran. The report went on to describe how these second-wave Iranians, as opposed to earlier immigrants, were more likely to identify themselves as exiles or political refugees.

14. PAAIA has also published reports documenting how upon arriving in the United States Iranians quickly assimilated into and thrived in American culture. PAAIA provides some

of this information on the Demographics & Statistics page of its website, <http://www.paaia.org/CMS/demographics--statistics.aspx>. As PAAIA details online, Iranian Americans have educational attainments that greatly surpass the national average. According to Ronald H. Bayer's *Multicultural America: An Encyclopedia of the Newest Americans*, about 50 percent of all working Iranian Americans are in professional and managerial occupations, greater than any other group in the United States at the time the survey was conducted.

15. While assimilating into American society, Iranian Americans maintain close ties to their family in Iran. According to PAAIA's 2016 National Public Opinion Survey of Iranian Americans, available online at <http://www.paaia.org/CMS/Data/Sites/1/PDFs/PAAIA-2016-Reportrev-newcover.pdf>, 84% of respondents have family in Iran and approximately one-third are in contact with their family or friends in Iran at least several times per week. PAAIA's 2016 survey further reported that thirty percent of respondents traveled to Iran once every two or three years.

16. Both as individuals and as a community Iranian Americans have actively participated in and enriched all levels of American culture and society, and have contributed to economic growth in America. PAAIA has profiled or made public information about many prominent Iranian Americans, including Cyrus Habib, Lieutenant Governor of Washington; Hadi Partovi, CEO of education non-profit Code.org; and Firouz Naderi, the former associate director of NASA's Jet Propulsion Laboratory. Iranian Americans have also founded some of the most innovative companies in the last twenty years and have been on the forefront of innovations in the technology sector. To provide just a few examples of prominent Iranian Americans who I am aware of, an Iranian American, Pierre Omidyar, founded eBay; an Iranian American, Omid Kordestani, serves as the Executive Chairman of Twitter; Farzad Nazem, serves as chief

technology officer at Yahoo; an Iranian American, Salar Kamangar, is currently the CEO of YouTube; Iranian American Omid Kordestani is Twitter's Executive Chairman.

17. Iranian Americans have also made significant contributions to the arts, such as Shoreh Aghdashloo, an Iranian American actress whose work has been recognized by the Emmys and the Oscars, and Nasser Ovissi, an internationally acclaimed artist.

18. I am also aware of Iranian Americans who have made important contributions in public service, serving in both national and state offices, such as Cyrus Amir-Mokri, who served as the Assistant Secretary for Financial Institutions at the United States Treasury; Faryar Shirzad, who served on the staff of the National Security Council; Goli Ameri, the current President and CEO of the Center for Global Engagement; and Azita Raji, who was nominated by President Obama to serve as United States Ambassador to the Sweden.

19. And, while the Iranian-American community has been smeared as terrorists by the Executive Order, the very first responder in the San Bernadino terrorist attack was an Iranian-American medic. One of the victims of that atrocious act was also an Iranian-American.

IV. PAAIA's Interest In and Concern About Enforcement of the January 27, 2017 Executive Order

20. PAAIA is vitally interested in and concerned about the January 27, 2017 Executive Order, "Protecting the Nation from Foreign Terrorist Entry into the United States" (the "EO").

21. The EO disrupts PAAIA's mission of encouraging constructive relations and enhancing mutual understanding between the peoples of the United States and Iran. We are receiving inquiries from our membership as to whether the enforcement of the EO will also strain relations between the United States and Iran, thereby debilitating PAAIA's mission of

promoting greater understanding between the Iranian and American people. Members are concerned that the Executive Order creates a negative stigma on Iranian Americans, directly conflicting with the missions and purposes of PAAIA, which stands for the positive impact of Iranian Americans.

22. PAAIA's members have been adversely affected by the signing of the EO. For example, a PAAIA member—an Iranian-American, internationally renowned doctor, who immigrated to the United States after the Iranian government imprisoned him for several years in what was considered to be an unjust and politically motivated strike—was tremendously impacted by the EO when his brother, despite having a valid visa and being a visiting scholar at an American university, was not allowed to re-enter the United States this week after visiting their elderly father in Iran. This member reached out to me, and through PAAIA's connections I helped him obtain assistance from attorneys working with Iranian Americans whose family members have been stranded in Iran as a result of the EO. In addition, members with family in Iran are concerned about the likelihood that their family will no longer be able to come to the United States, in some case their parents.

23. Enforcement of the EO has already caused PAAIA to divert substantial resources to combating the EO's discriminatory effects, and will continue to do so. Since the EO was signed, PAAIA has had to divert most of its resources to responding to media inquiries and requests about the impact of the EO on Iranian Americans and their families, providing guidance and educating the public on the impact of the EO, and developing a strategy for how to respond to the EO. PAAIA has held emergency phone calls on this subject, including an emergency telephone conference for concerned Iranian Americans with immigration and civil rights lawyers to provide its members and other Iranian Americans information about the EO and how it might

impact their lives. PAAIA has also prepared several press releases and informational memorandum for its members concerned about the EO. The day to day activities of PAAIA have shifted away from its regular programs and activities towards combating the negative and wrongful effects of the EO on PAAIA's members and other Iranian Americans.


24. After the EO was signed, PAAIA had to divert its resources away from its normal programming and activities. For example, PAAIA was scheduled to launch a new fellowship program for Iranian American youth, but was unable to do so after the EO forced PAAIA to divert its resources. Similarly, the EO forced PAAIA to postpone an event that was going to be hosted on behalf of an Iranian American running for local office. PAAIA has also been unable to devote staff time to activities such as planning for the organization's upcoming annual event on Capitol Hill, fundraising for the organization, informational and networking events for members, and electioneering activities for the organization.

25. As another example of how PAAIA has had to divert resources to address the EO, shortly after the EO was signed, on January 29, 2017 I wrote an op-ed piece for the Huffington Post detailing how the EO punished Iranian Americans who had proven every day that they were patriotic and fully supportive of national security concerns. As I explained in this article, the United States should not "turn a blind eye to the fact that the people of Iran have consistently demonstrated their affinity for the core values of our American democracy including liberty, freedom, and the rule of law. . . . [B]y using a broad brush to label all Muslims as enemies of America, the order ignores the fact that there has never been a single act of terror committed by anyone of Iranian descent in the United States." This article was published online at http://www.huffingtonpost.com/entry/punishing-the-innocent-in-the-name-of-national-security_us_588d7674e4b017637794e356?u4ajuw4rcyvr96bt9.

26. The EO will continue to force PAAIA to divert time and resources. In addition to having to closely monitor the impact of the EO on its members and other Iranian Americans, including U.S. citizens and their family members, PAAIA will have to continuously research and analyze legal actions, monitor announcements and activity from the Department of Homeland Security and other agencies, respond to and act upon concerns from Iranian Americans about the EO, and rally the community to direct their concerns to their Congressional representatives.

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

Executed this 8 day of February, 2017, in Washington, DC



Leila Golestaneh Austin
Executive Director, Public Affairs
Alliance of Iranian Americans