

**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 PARS EQUALITY CENTER IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Bitia Daryabari 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, and am competent to testify thereto.

2. I am the Founder and Executive Director of The Pars Equality Center (Pars). In this capacity, I serve as the leader of all of Pars' departments. I also facilitate Pars' work with other like-minded organizations, engage in fundraising efforts on behalf of the organization, and work with the Board of Directors.

3. The Pars Equality Center is a 501(c)(3) non-profit dedicated to helping all members of the Iranian-American community and other Persian-speaking countries realize their full potential as informed, self-reliant, and responsible members of American society. Pars believes that learning and teaching the rights and responsibilities of citizenship in a democracy as well as the rules and rewards of entrepreneurship are the necessary

ingredients for our success as a community. Pars achieves its mission primarily by providing extensive social and legal services out of community centers. The organization's Persian-speaking staff advocates for families and individuals in need with a strong focus on refugees, asylees, and those newcomers living in poverty. The Board of Directors of Pars are all of Iranian descent. Pars is based in California.

4. While its focus is on the Iranian-American community, Pars does not close its doors to anyone seeking its services. Especially in its immigration services, Pars serves clients from various backgrounds and nationalities. In 2016, Pars provided 20,713 units of service¹ across all of its locations, with the majority of clients of Iranian descent.
5. Among other things, Pars provides mentorship and career development for Iranian-Americans. For example, Pars hosts a Silicon Valley career development techniques and best practices workshop, which covers resume writing, successful interviewing, information about the culture of the workforce in Silicon Valley, and how employees can make themselves an instant asset to potential employers. Pars also hosts a "Generation +" initiative that provides the younger generation of Iranians, both American-born and immigrants, with career mentors, peer mentors and career opportunities. Pars selects a broad array of mentors from the private, public, and art sectors, provides formal mentorship that connects younger Iranians with mentors that best fit that individual's needs, and organizes social events to allow members of the community to bring together the community and facilitate career connections. Through its work with Generation +, Pars acts as a catalyst for social, cultural and economic integration of Iranians speaking communities to achieve their highest potential.

¹ A "unit of service" measures one service – for example, one workshop, one immigration-related consultation, or one ESL class. One individual can receive multiple units of service from Pars.

6. Pars provides various other social services to Iranian Americans and Persian speakers of all ages. Pars provides, among other things, English as a Second Language (ESL), citizenship, and resume writing/interview skills classes; computer training and access to employment resources including job fairs; assistance navigating the social and medical systems; and other services to improve the quality of the family's life in our community. Through the Kordestani Family Fund, Pars also invests in the education of Iranian American youth by providing a grant each year to a student of Iranian descent graduating from high school in California with specific plans to continue their education in a College or University in California. PARS also has a social club for Persian speaking immigrants over the age of 55 which includes interactive programs, tours and picnics to provide an uplifting and inspiring environment that these individuals can call home away from home.
7. The legal services provided by PARS are intended to provide community members the resources to become productive citizens by educating and advocating on behalf of individuals in the community. The legal staff members at PARS are either licensed attorneys or accredited Board of Immigration Appeals representatives, and they guide individuals through the immigration process and provide extensive legal services, including: citizenship, green card renewals, domestic violence based petitions, family relative petitions, travel documents, issues arising in the refugee context, and counselor processing.
8. PARS's legal team also works on a national level to offer advice, analysis and legal research in other areas, including litigation, employment, family and sanction law issues. To this end, PARS works with other organizations, such as the Iranian American Bar

Association and the Public Affairs Alliance of Iranian Americans, across the United States to educate the community about relevant legal issues and advocate on behalf of Iranian Americans in the U.S.

9. I have a long-standing passion for increasing knowledge of my native Iranian culture, as well as improving the lives of people from Iran and beyond. I founded the Pars Equality Center in 2010 to be a community-based social service and legal services foundation and have served as its Executive Director since that time. Prior to my work at Pars, I received my Master's degree at Golden Gate University in California, where I was later awarded the Alumni of the Year award in 2008. Upon graduation, I joined GammaLink, Inc., one of the early pioneers in the field of telecommunications. I later moved to MCI Communications where, more than once, I received distinguished medal awards and recognition for my work. I have also been recognized for my various philanthropic efforts, and have received the Ellis Island Medal of Honor (2012); the United Nations Appreciation Award for Outstanding Leadership, Commitment and Support of the UN, and Achieving the UN Millenium Development Goals (2011); and the Public Affairs Alliance of Iranian Americans Philanthropist of the Year Award (2010).

Harm to PARS caused by the January 27, 2017 Executive Order

10. Pars is extremely concerned about the EO because it has already had, and will continue to have, a highly negative impact on both the community that we serve as well as the mission and purpose of our organization. For the reasons discussed below, enforcement of the EO will harm Pars' mission in multiple ways and has already forced Pars to scramble to address its effect, thus causing Pars to divert valuable resources away from its usual activities.

11. The goal of the legal services that Pars typically provides — to effectively use the immigration laws to advocate on behalf of immigrants, including immigrants from Iran, and to guide individuals through immigration processes — has also been crippled by the EO. While Pars attorneys seek to provide concrete answers, at present the EO's vagueness and ambiguity prevents them from informing those who seek their services what to expect with their or their family members' pending visa and green card applications, whether they should submit future petitions, or whether they will be able to travel outside of the United States – for work or pleasure – in the future. The assistance that Pars typically provides to individuals with their visa applications or green card petitions is at best severely delayed; at worst, it is at a complete standstill.
12. The EO will have a severely negative impact on the mission of our organization. Pars seeks to facilitate the social, cultural and economic integration of Iranians to achieve their highest potential while also staying connected to their Iranian heritage. However, the EO falsely singles out Iranians in the United States and those seeking to enter as a terrorist threat. Such a negative label on the Iranian-American community has already sown fear and anxiety in the community we serve. The stigma and discrimination that is caused by the Ban will exacerbate the challenges that immigrant groups, especially immigrants from primarily Muslim countries like Iran, already face in the United States.
13. Pars also seeks to elevate Iranians and Persian speakers to achieve their highest career potential in the United States. However, the EO blocks the entry of, or forces the departure of, many Iranians who would otherwise have contributed to the vibrant and creative economy of the United States. For example, based on my leadership of and experience with Pars' mentorship and career development, Generation +, and educational

programming, I believe it is likely that the EO will affect the decisions of employers, who may prefer not to hire or sponsor Iranian visa holders, or even legal permanent residents and dual citizens. In addition, the EO will cause individuals with high levels of educational attainment – Master’s and PhD degree holders who are applying for H1B, or other business or student visas – to be denied visas or for their visas not to be renewed. Some of these educated individuals may also choose to leave the United States, even if it means leaving behind promising careers or degree programs, in order to be reunited with family who is not able to enter the United States.

14. The psychological and emotional toll of the EO has already come into stark relief in conversations between Pars staff and Iranian Americans. Entire families are experiencing profound disruption, given that the children of visa holders may be well-integrated into American life and culture, yet the EO may soon force their parents to leave the United States. In short, while Pars fights for families to establish themselves in their communities and for individuals to achieve their greatest career potential, the EO is likely to cause family separation and a brain drain from the United States.
15. The purposes of Pars’ citizenship classes will also be undermined by the EO. Pars teaches Iranian immigrants about the U.S. democratic system, and the rights and privileges that it bestows. The goal is for those who learn at Pars to become well-integrated, self-sufficient members of their communities. However, after the EO, Pars has been unable to answer basic questions about what the U.S. government has in store for those entering the country from Iran and those currently in the United States on visas. The EO has made it difficult, if not impossible, for many individuals to plan their future lives in the United States. It has all but put hopes of citizenship and permanent status out of reach for those

who do not have it, including refugee applicants and asylum applicants. And for dual citizens and permanent residents both, the EO means that they may not be able to have their family members join them in the United States as planned. The vast uncertainty, confusion, and deep fear caused by the EO has already manifested itself great harm to the communities that Pars serves as well as the organization's mission. That harm will only continue to deepen as the EO continues to be enforced.

16. Our organization has suffered economic harm directly as a result of the EO. Since the signing of the EO, our legal services staff has received twice the typical volume of calls, emails, in-person questions and other inquiries. Individuals of all legal statuses — dual citizens, green card holders, visa holders, those seeking protected status (VAWA, U Visa, 10751 with waiver), refugees and refugee applicants, and asylees and asylum applicants, and others — have called with fearful questions about themselves or their loved ones. Instead of our usual legal services, we have been focused almost completely on addressing unanswerable queries about the EO.
17. Our legal services team is inundated with constant telephone calls, emails, and messages. In the week following the signature of the EO, the Senior Director of the Legal Department alone has been forced to devote dozens of hours of her time solely to dealing with EO-related issues. In fact, the work of answering calls and answering the queries of individuals has spilled over to our social services team, which would typically make a referral to the legal services team, because legal services is so overwhelmed.
18. The individuals who have contacted Pars as a result of the EO include asylum applicants from Iran outside the United States who are unable to enter the United States, as well as

those Iranians who have been granted refugee status in the United States but whose families are still abroad and now unable to join them.

19. Our resources have also been diverted from our typical programming. Instead of preparing and giving panels and presentations on topics of education, citizenship, and career, we have been forced to present almost exclusively on the EO and its impact on the Iranian American community. Since the EO was signed, we have spent significant time organizing with other groups and entering into coalitions to share information and be able to adequately inform the community about its effects.
20. As an example, one attorney at Pars has been unable to work on any of the cases to which she was assigned before the EO was signed. Instead, she spends all of her working time researching updates on the EO and making presentations on its impact. For one of her presentations, she had to seek out the assistance of a psychologist who would counsel distraught individuals after her presentation.
21. Another attorney has had to devote significant time completing research on the EO and basic constitutional analysis so that she could respond to queries received by Pars, instead of performing her regular job functions. Other staff members, particularly within Pars' legal services branch, have spent their time educating themselves about the EO and regularly posting online about it for the benefit of the impacted community.
22. In summary, the EO has caused profound psychological and emotional harms to the Iranian-American community. It has created fear and anxiety and separated and unmoored families. It has also put into jeopardy the economic security of these communities and is sure to cause a brain drain from the United States as many Iranian immigrants, refugees and Iranian Americans are forced to, or choose to, leave the country

in search of more stable employment, reunification with their families, or both. By extension, the EO will also weaken the economic contribution of the Iranian-American community to the United States. The EO has crippled core aspects of Pars' mission and wreaked havoc on the organization's ability to continue with its usual programming, social, educational, and legal services.

I, Bitya Daryabari, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of ~~January~~ ^{February}, 2017, in San Jose, CA.

Bitya Daryabari/BJF
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