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## **EXHIBIT 5**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF ALI ASAEI IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Ali Asaei, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen. I first came to the United States on September 6, 2013 on an F-1 student visa. I obtained my master's degree in electrical engineering at SUNY – New Paltz in December 2015.

3. I then applied for and was granted F-1 OPT status, which allows me to perform work directly related to my major area of study for twelve months. My OPT status expires in June 2018.

4. Since August 2016, I have been working as a research assistant at the Nathan Kline Research Institute, which is part of the Research Foundation for Mental Hygiene (RFMH).

5. I live in Fort Lee, New Jersey.

6. As a research assistant, I complete MRI image processing of brains to understand brain structure as well as the structure of diseases like Alzheimer's and Parkinson's disease. Our goal is to learn enough about the brain to predict the occurrence of these and other diseases. The funding for this project comes from the National Institute of Health (NIH).

7. In addition to my work as a research assistant, I help write image processing software that has clinical and/or research applications.

8. Outside of my work at RFMH, I have also volunteered with a local refugee organization in Jersey City, New Jersey.

9. I was also recently featured in a New York Times article entitled, "Twitter Adds New Ways to Curb Abuse and Hate Speech,"  
[https://www.nytimes.com/2016/11/16/technology/twitter-adds-new-ways-to-curb-abuse-and-hate-speech.html?\\_r=0](https://www.nytimes.com/2016/11/16/technology/twitter-adds-new-ways-to-curb-abuse-and-hate-speech.html?_r=0)

10. I last saw my mother and sister in 2014, when they visited me in the United States on B-1 and B-2 tourist visas. I have not seen my brother or father since 2013.

11. My parents and sister have long been planning to visit the United States. I personally petitioned for visas for my family. My parents paid \$160.00 each for their visa applications.

12. Within a few years of applying, they were able to get a nonimmigrant visa appointment at the U.S. Embassy in Dubai. The appointment was scheduled for February 15, 2017.

**II. Harm Caused by the January 27, 2017 Executive Order:**

13. As a result of the January 27, 2017 Executive Order (EO), the U.S. Embassy in Dubai sent my parents an email on January 31, 2017 notifying them that their visa appointment has been cancelled.

14. My parents' and sister's visa appointment was eventually rescheduled for February 16, 2017. They traveled to the U.S. Embassy in Dubai for the appointment.

15. My parents' and sister's visas were denied during their interview. When they asked the consular official for the reason for their denial, they were told by the consular official, "we cannot give you a reason for the denial."

**III. Harm From March 6, 2017 Executive Order:**

16. President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

17. If and when the March 6 Executive Order is enforced, it is unlikely that I will be able to extend or apply for new work authorization when my current OPT status expires in June 2018. As a result, I will be forced to quit my job and leave the United States permanently.

18. In addition, if and when the March 6 Executive Order is enforced, the chances that my parents and sister could re-apply for a new visa to visit me in the United States will be severely diminished. The prospect of remaining separated from my family has caused me great mental and emotional distress.

19. I am greatly saddened by the fact that I live in a country in which Iranians — good people like my parents and sister — are unable to visit.

20. As a result of the prospect that I will be unable to renew my work authorization in the future, and due the enforced separation from my family, I have decided to leave the United States shortly and return to Iran.

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

Executed this 9 day of March, 2017, in Orangeburg, NY.

/s/ Ali Asaei

Ali Asaei

## **EXHIBIT 6**



**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF SHIVA HISSONG IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Shiva Hissong, hereby declare and state as follows:

1. My name is Shiva Hissong. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I reside in Spokane, Washington. In November 2016 I received authorization to work in the United States but am currently a stay-at-home mother. My husband works as an architect in Spokane, and owns an architecture firm and an advertising agency.

3. I am a citizen of Iran and a Green Card holder (legal permanent resident) of the United States.

4. I am a Muslim and adhere to the religion of Islam.

5. I was a student in Italy from August 2012 until March 2016. I was there on a student visa and earned credits toward my Bachelor's Degree in fashion. While studying in Italy, I met my husband in Rome.

6. After my future husband and I got engaged, I applied for and received a K-1 visa.

7. I entered the United States on this K-1 visa on March 3, 2016.

8. My husband and I were married on April 17, 2016 and hosted a wedding ceremony on August 28, 2016 in Spokane, Washington.

9. My parents reside in Tehran, Iran. They are Iranian citizens. My father has been ill with Parkinson's disease for the past ten years, and his condition has significantly deteriorated in the last three to four years.

10. My parents were unable to obtain visas to attend my wedding due to a lack of visa appointments at the United States Embassies in the United Arab Emirates, Armenia, or Turkey.

11. Subsequently, my parents decided that they would try to visit the United States for the birth of their grandson.

12. In October 2016, my parents were able to get a visa appointment at the United States Embassy in Yerevan, Armenia. The interviewing officer informed my parents that they had to undergo an administrative interview that would take approximately three to six months.

13. My son was born on November 28, 2016. My parents were not present for his birth pending their visa applications and administrative process. They have not yet met my son.

14. In light of my father's illness and the extended application process for my parents to obtain a visa to visit the United States, my parents and I made plans to meet in Dubai, United Arab Emirates in March 2017 so that my parents could meet their grandson.

**II. Harm Suffered Post January 27, 2017 Executive Order:**

15. Prior to my parents completing an administrative interview for their visa applications, President Donald Trump signed an Executive Order on January 27, 2017 (January 27 Executive Order) immediately prohibiting the issuance of visas to Iranian citizen and prohibiting the entry of Iranian citizens into the United States.

16. Following the signing of the January 27 Executive Order, the United States Embassy in Yerevan, Armenia did not, to the best of my knowledge, issued any electronic mail or guidelines to my parents with respect to their applications.

17. As a result of the confusion and uncertainty surrounding my parents' visa applications under the terms of the January 27 Executive Order, I did not know if my parents would be able to visit the United States and meet my son while my father is healthy enough to travel.

18. The morning after the January 27 Executive Order was signed, the immigration attorney that I had retained advised me that I should not leave the United States due to the January 27 Executive Order. I became very concerned about my ability to exit and reenter the United States, and decided to cancel my family's visit to the United Arab Emirates in March 2017.

19. In addition, prior to the signing of the January 27 Executive Order, my husband and I had purchased plane tickets to visit Amsterdam, the Netherlands. Following the signing of

the January 27 Executive Order, I became concerned about my ability to exit and reenter the United States and have subsequently decided not to visit the Netherlands as originally planned.

20. I have received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the issuance of visas and/or whether my parents' visas will be issued in course or whether it will not be issued under the terms of the January 27 Executive Order.

21. I very frequently check the website of the U.S. Embassy in Armenia for any updates on my parents' visa applications. Since the January 27 Executive Order was signed, the website has not indicated whether my parents' visa was revoked (and, if so, whether it was reinstated); whether the processing of their visa application has been suspended; or whether their visa is being processed.

22. I have checked the website of the U.S. Embassy in Armenia frequently for any updates on my parents' case or the issuance of visas generally. The last time I checked, the Embassy website stated that visa processing is currently delayed.

### **III. Harm From March 6, 2017 Executive Order:**

23. President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

24. The terms of the March 6 Executive Order prohibit the approval and issuance of my parents' tourist visa. I am concerned that if and when the March 6 Executive Order goes into effect, my parents' tourist visa will be denied and they will be unable to travel to the United States while my fathers' health still allows him to do so. As a result my parents will be unable to visit me and my family and meet their grandson for the first time.

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

Executed this 11 day of March, 2017, in Spokane, WA.

A handwritten signature in black ink, appearing to read 'Shiva Hissong', is written over a horizontal line.

**Shiva Hissong**

## **EXHIBIT 7**

**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. 17-cv-255
	)	
Donald J. Trump, President of the United States,	)	
<i>et al.</i>	)	
	)	
	)	
<i>Defendants.</i>	)	

**DECLARATION OF JANE DOE #1 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #1, hereby declare and state as follows:

1. My name is Jane Doe #1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am 28-years-old and currently reside in San Diego, California. I am employed with the City of San Diego. I have my Master's Degree in city planning from San Diego State University.

3. I am a dual citizen of the United States and Iran.

4. I am a Muslim and adhere to the religion of Islam.

5. My family sold all of their belongings and assets in Iran and immigrated to the United States in 2001. I was 11-years-old at the time and moved with my mother, father, and sister.

6. It took approximately twelve (12) years for my family to be approved to become Green Card holders (legal permanent residents). My family has continued to live in the United States since 2001 and myself, my mother, my father, and my sister are all United States citizens.

7. Both of my parents are small business owners in the United States.

8. In 2013, I met my fiancé in San Diego while he was visiting the United States on a tourist visa. He is 29-years-old with a Master's Degree in engineering from Sharif University of Technology in Tehran, Iran.

9. After traveling to Iran several times to visit my fiancé, we got engaged to be married in October of 2015. Thereafter, we immediately engaged the services of a Los Angeles, California immigration attorney in December of 2015 to assist us with the visa process for my fiancé to move to the United States.

10. My fiancé's petition for K-1 visa was submitted in February 2016 and was approved by April of 2016. The case was created by May of 2016.

11. In October 2016, my fiancé and I traveled to Abu Dhabi for the immigrant visa interview. Thereafter, the visa was adjudicated and approved, and we were advised that "additional administrative processing" could take up to six months.

## **II. Harm Caused by the January 27, 2017 Executive Order:**

12. Subsequent to the approval in October of 2016, but prior to my fiancé's visa being issued, President Trump signed an Executive Order on January 27, 2017 (January 27 Executive



Order) immediately prohibiting the issuance of visas to Iranian citizens, and preventing the entry of Iranian citizens into the United States.

13. I have personally checked the U.S. State Department website every day since October 2016 for status updates on my fiancé's visa. The last entry was updated on January 10, 2017 containing only general information.

14. To date, I have paid approximately \$5,000.00 in travel expenses to Abu Dhabi for my fiancé's immigrant visa interview. I have also paid approximately \$3,500.00 in legal fees.

15. I received no guidance, information, clarity, instruction, or correspondence from the United States government or my attorney concerning the issuance of visas and/or whether my fiancé's approved visa will be issued in course or whether it will not be issued under the terms of the January 27 Executive Order.

16. I checked various internet websites and blogs every day since January 27, 2017 in an attempt to gather further information about the issuance of visas.

17. I called the U.S. Embassy in Abu Dhabi. However, they did not provide me with any information on my fiancé's visa.

18. I called U.S. Senator Kamala Harris in hopes that her staff can help move my fiancé's case along, or at least provide me with information on its status. However, Senator Harris's office has also not helped me.

19. As a direct result of the uncertainty caused by the Executive Orders, I have been extremely anxious, stressed, unable to sleep and eat, and nervous because I am unclear about whether I will be able to be reunited with my fiancé and get married.

### **III. Harm From March 6, 2017 Executive Order:**

20. President Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

21. The terms of the March 6 Executive Order prohibit the issuance of my fiancé's visa. I am concerned that if and when the March 6 Executive Order goes into effect, my fiancé's K-1 visa will never be issued, he will be unable to travel to the United States, and we will be unable to get married in the United States as planned.

22. Prior to the January 27 and March 6 Executive Orders, my fiancé and I had been planning an extravagant wedding ceremony in the United States that was scheduled for 2018.

23. To date, I have spent hundreds of hours planning my wedding and I have executed contracts and paid \$2,500.00 as a down payment to secure a wedding venue. An additional \$2,500.00 payment will become due in May of 2017. As a result of the uncertainty surrounding my fiancé's visa under the terms of the March 6 Executive Order, I don't know if I should continue to make payments to the wedding venue and/or otherwise continue planning our wedding ceremony.

24. After the March 6 Executive Order was signed, I again called the U.S. Embassy in Abu Dhabi but was still unable to receive any information. I continue to check the U.S. State Department website on a daily basis, but there have been no updates posted.

25. I have received no guidance or information from the United States government regarding my fiancé's K-1 visa in the wake of the March 6 Executive Order.

26. I have joined this lawsuit as an anonymous Plaintiff because I am afraid that the State Department, USCIS, the NCV, and/or the government agencies listed as Defendants will take retaliatory action against me or my fiancé for participating in this action.

I, Jane Doe #1, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8 day of March, 2017, in San Diego, CA.

/s/ Jane Doe #1  
Jane Doe #1

## **EXHIBIT 8**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #4 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #4, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I currently reside in San Francisco, California. I am employed full time with an architectural firm.

3. I am an Iranian citizen and was granted asylum in the United States in June 2016. I am currently in the process of obtaining my Green Card. I am a member of the Erfran-e-

Halgheh, also referred to as the Circle of Mysticism. I originally entered the United States with a student visa. I applied for asylum in the United States approximately three and a half years ago because I feared religious persecution in Iran. Members of my spiritual group have recently been killed by Iranian officials and I am unable to return to Iran.

4. I have lived in the United States since fleeing Iran in 2013. My parents still live in Iran and were planning to visit me this year. My parents applied for tourist visas in November 2016 at the U.S. Consulate in Istanbul, Turkey, and started the process of making travel arrangements to see me.

## **II. Harm Suffered Post January 27, 2017 Executive Order:**

5. On January 27, 2017, President Trump issued an Executive Order (January 27 Executive Order) restricting the issuance of visas to Iranian citizens, and preventing Iranian immigrants and nonimmigrants from entering the United States.

6. I was instructed by my immigration attorney not to travel outside of the United States because of the January 27 Executive Order. I had been planning to travel this year to Amsterdam to visit some friends who are currently living in Europe. My friends will be returning to Iran later this year, and when that happens I will be unable to see them because I cannot return to Iran.

7. The Executive Order also put into jeopardy the plans of my parents to visit me in the United States.

## **III. Harm from March 6, 2017 Executive Order**

8. President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens effective March 16, 2017.

9. The terms of the March 6 Executive Order prohibit the approval and issuance of my parents' tourist visas. I am concerned that if and when the March 6 Executive Order goes into effect, my parents' tourist visas will be denied and they will be unable to travel to the United States.

10. My parents have called the U.S. Consulate in Istanbul but have not been able to receive any information about their tourist visa. We have also checked the status of their visa application online but there have been no updates on the status.

11. I do not have any family in the United States; all of my family is in Iran. I am close to my family and the physical separation is very emotionally and mentally difficult for me. I am unable to visit my parents in Iran because it is unsafe for me to return there. If and when the March 6 Executive Order is enforced, I will face indefinite separation from my parents and the rest of my family.

12. I am afraid that the State Department or other branches of the federal government will take retaliatory action against me for being a party to this action. I am especially concerned about retaliatory actions impacting my immigration status as I am still in the process for applying for my Green Card, and about retaliatory actions affecting my parents' visa application.

I, Jane Doe #4, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of March, 2017, in Cupertino, CA.

/s/ Jane Doe #4

Jane Doe #4



## **EXHIBIT 9**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #8 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #8, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I grew up in Iran in a traditional Muslim household. The Muslim community in Iran has not been accepting of my sexual orientation.

4. As a teenager living in Iran I did karate. At one karate event that I attended at the age of sixteen, I met a man who was a year older than me. We became friends. When I was

nineteen, he asked me to marry him. I told him I could not marry him because I was a lesbian and in love with someone else. At first, the man seemed to accept my rejection of his marriage proposal.

5. Later, when I was twenty years old, I was the editor of an underground LGBT magazine, administrator of an LGBT rights group and counselor to other LGBT individuals. I had also published a fiction book about a transgender man which discusses sex trafficking.

6. When I was twenty one years old, the man invited me to his sister's house to show me some LGBT books and materials. When I went to his sister's house, he raped me. After that, he continued to harass me and threaten me. He would sexually assault me about once per month. One time, when we were smoking hookah, he burned my hand with the hookah coals. The mark from this burn remains on the palm of my hand even now.

7. I was unable to extricate myself from this relationship because the man began to blackmail me. He found out that I was the editor of an underground LGBT magazine and threatened to expose me to the government if I did not marry him. His brother and other members of his family worked for an office of the Iranian government that monitors the activities of citizens, and his uncle was the regional head of a charitable organization that has ties to the Islamic Revolutionary Guard Corps (also known as Sepah). I knew that he had the power and connections to follow through on his threats. He began to threaten the safety of my sister. He also told me that he would expose the fact that I was a lesbian to my family and that they would be extremely ashamed of me, and also be placed in physical danger as a result. I became very scared for my physical safety as well as the physical safety of my family.

8. I fled to Turkey in June 2014. When I fled, I wrote an email to my friend, Jane Doe #9, who is now my partner and fiancée. She followed me to Turkey six months later. After a

few months in Turkey, we became a couple. Recently, I proposed to her and we are now engaged to be married.

9. My life in Turkey has been very difficult. Many people in Turkey are not accepting of my sexual orientation. I have worked in the textile industry while here in Turkey. I often work 14-hour days and get paid barely enough to buy minimal food and to pay our rent. We can't afford to buy medicine when we are sick. Our house is full of mold and we sleep on a sofa. There is only one table and one chair in the room.

10. However, I have not given up on my advocacy while in exile in Turkey. I received funds from Outright Action International, a leading human rights organization, to write and publish one booklet in a three-part series. The booklet I wrote describes different types of sexual orientations and terminologies to be used by reporters and media when writing articles about the LGBT community. The booklet has been published by a publisher in Canada. I also worked for a human rights organization called Justice for Iran until February 2016 as a communications officer, managing their media, Facebook presence, and twitter feed. I will soon begin working for another London-based LGBT organization focusing on lesbian and transgender women.

11. My current situation, along with that of my partner's, is unsustainable. Because of my sexual orientation, I was unsafe in Iran and I am unsafe in Turkey. I have applied for refugee status and would like to be resettled to the United States where I will be safe from persecution and able to find stable employment.

12. I reached out to the Office of the UN High Commissioner for Refugees (UNHCR) soon after I arrived in Turkey in June 2014 and sought to be admitted to a Refugee Admissions Program. After a lengthy interview and vetting process, including multiple interviews in 2015,

UNHCR determined that I had refugee status and provided me with documentation confirming my designation as a refugee. UNHCR first referred me for resettlement in Canada. However, my partner and I learned that Canada would not accept both of our applications together. I want to be resettled with my partner. In December 2016, UNHCR referred me to the United States as a candidate for resettlement through the Refugee Admissions Program (USRAP). I know that the U.S. Refugee Admissions Program has admitted to the program many same-sex applicants.

13. In December 2016, I was interviewed by the International Catholic Migration Commission (ICMC), which is a State Department contractor that interviews refugees who have been referred for possible resettlement to the United States. I was waiting for my second interview to be scheduled when the Executive Order was signed.

## **II. Harm Suffered Due to the January 27, 2017 Executive Order:**

14. I am aware that, on January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) that negatively impacts the refugee admissions process for citizens from certain countries, including Iran.

15. After the January 27 Executive Order was signed, the ICMC website posted a notice informing me that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the January 27 Executive Order. I was very distraught. I have been waiting for this opportunity for so long and it is my only hope to escape the horrible living conditions in Turkey and Iran. Because of the January 27 Executive Order I am very concerned about whether I will ever be approved by the United States to participate in the Refugee Admissions Program.

16. In February, I learned from news reports that the January 27 Executive Order was halted by U.S. courts. When I heard this news, I sent an email to ICMC asking whether my second interview could be scheduled.

17. On February 8, 2017, I received the following email response from ICMC:

“Dear applicant,

Thank you for your email,

Currently, your case is pending USCIS interview to be scheduled. Be advised that your case status will not change during the suspension period.

As stated in the Executive Order signed by the President, the United States government has suspended all refugee admissions for 120 days effective January 27, 2017.

The Resettlement Support Center (RSC) Turkey and Middle East (TuME) will continue to maintain all case information and biodata on file for all refugees who have been referred for resettlement to the United States.

You may write to [info.rsc@icmc.net](mailto:info.rsc@icmc.net) or call +90 212 219 2055 (Monday – Friday from 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information.

Please note the RSC will not be able to provide further information regarding the 120-day suspension at this time.”

18. I emailed ICMC again on February 17th and, on February 19th, received an identical email response.

19. Since receiving those emails from ICMC, I have received no information or communication from ICMC regarding my and my partner’s second interview.

### **III. Harm From March 6, 2017 Executive Order:**

20. I am aware that President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) that negatively impacts the refugee admissions process for citizens from certain countries, including Iran, effective March 16, 2017.

21. I checked the ICMC website after the March 6 Executive Order was signed. It stated that refugees who have not already been approved for admission to the United States and scheduled for departure — refugees like me and my partner — are impacted by the Executive Order.

22. I am currently in limbo and do not know what will happen with my USRAP application. If and when the March 6 Executive Order is enforced, I will be unable to move to the United States with my partner. I am unable to return to Iran for fear of being exposed as an LGBT person and subjected to violence by the Iranian government. I also fear violence here in Turkey.

23. I fear that the U.S. government will retaliate against me because of my involvement in this lawsuit. I am concerned that my involvement will impact my acceptance in the Refugee Admission Program and harm my chances to be approved by the United States. I also fear persecution from the Iranian government if it were to become aware of my application for refugee status in the United States, or my involvement in this lawsuit.

I, Jane Doe #8, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9 day of March 2017, in Denizli, Turkey.

/s/ Jane Doe #8  
Jane Doe #8



## **EXHIBIT 10**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #9 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #9, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I grew up in Iran in a traditional Muslim household. The Muslim community in Iran has not been accepting of my sexual orientation or my gender identity. I am a transgender and LGBT woman.

4. When I was a teenager, I taught a class about metaphysics and the philosophy of the mind to others my age in a connection with a program sponsored by the Iranian Department of Education. My class became very popular. The imam responsible for running the local Department of Education program noticed the popularity of my class and believed I was smart. This imam tried to force me to work for the Islamic Revolutionary Guard Corps (known as IRGC or Sepah), but I refused to do so.

5. One day, someone from the Ministry of Intelligence of the Islamic Republic of Iran (also known as Ettelaat or MOIS) came to my school, pulled me out of class without my parents' permission, and took me back to their offices. I believe that the Ettelaat had found out about my gender identity and sexual orientation and were targeting me on that basis as well as due to my views on metaphysics. At their offices the Ettelaat officials slapped me in the face, punched me in the throat, and kicked me with their military boots. After that, they came to my house and took all of my books and my home computer. They also conspired to get me kicked out of school by ensuring that my teachers gave me a "zero" on each of my exams, regardless of the actual grade I had earned. When I tried to re-enroll in a different high school, I was not allowed to do so.

6. I felt physically unsafe in Iran and feared further violence from the Ettelaat or other parts of the Iranian government.

7. I heard from my friend, Jane Doe #8, who is now my partner, that she had run away to Turkey. Six months later, I also fled from Iran to Turkey. Recently, my partner proposed to me, and we are now engaged to be married.

8. I have been living in exile in Turkey since December 2014. My life in Turkey has been very difficult. Many people in Turkey are not accepting of my sexual orientation or my

gender identity. Much of Turkish society is transphobic and homophobic. Finding employment as a transgender woman in Turkey is difficult. I have been fired from many jobs just for being transgender. My partner and I are living in poverty. The law and the Turkish police do not protect us from the abuse we face at the hands of employers and neighbors. I was raped in Turkey, but because I do not speak Turkish and because the Turkish police are not sympathetic to people like me, there was nothing I could do.

9. A few times I went to get laser facial hair removal. The doctor and her assistant were so transphobic that they intentionally put the laser device in my eye. During another session, they put the laser device on my head, causing the hair on my head to fall out. I had to stop getting laser hair removal. Now, I only leave the house once a week. I feel like I am living in prison.

10. Because of my sexual orientation and my gender identity, I was unsafe in Iran and I am unsafe in Turkey. I would like to be resettled to the United States where I will be safe from persecution and able to find employment.

11. I reached out to the Office of the UN High Commissioner for Refugees (UNHCR) soon after I arrived in Turkey and sought to be admitted to a Refugee Admissions Program. After a lengthy interview and vetting process, UNHCR determined that I had refugee status and provided me with documentation confirming my designation as a refugee in April 2016. In December 2016, UNCHR referred me to the United States as a candidate for resettlement through the U.S. Refugee Admissions Program (USRAP). I am now waiting for the decision of the United States on acceptance to the program. I know that the U.S. Refugee Admissions Program has admitted to the program many same-sex applicants and I am waiting to be processed.

12. In December 2016 my partner and I had our first interview with the International Catholic Migration Commission (ICMC), which is a State Department contractor that interviews refugees who have been referred for possible resettlement to the United States. I then waited for our second interview to be scheduled.

## **II. Harm Suffered Due To January 27, 2017 Executive Order:**

13. I am aware that, on January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) that impacts the refugee admissions process for citizens from certain countries, including Iran.

14. After the January 27 Executive Order was signed, the ICMC website posted a notice informing me that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the January 27 Executive Order. I was very distraught when I heard this news. I have been waiting for this opportunity for so long and it is my only hope to escape the horrible living conditions in Turkey and Iran. Because of the January 27 Executive Order, I am very concerned about whether I will ever be approved by the United States to participate in the Refugee Admissions Program.

15. In February, I learned from news reports that the January 27 Executive Order was halted by U.S. courts. When I heard this news, my partner sent an email to ICMC asking whether our second interview could be scheduled.

16. On February 8, 2017, we received the following email response from ICMC:

“Dear applicant,

Thank you for your email,

Currently, your case is pending USCIS interview to be scheduled. Be advised that your case status will not change during the suspension period.

As stated in the Executive Order signed by the President, the United States government has suspended all refugee admissions for 120 days effective January 27, 2017.

The Resettlement Support Center (RSC) Turkey and Middle East (TuME) will continue to maintain all case information and biodata on file for all refugees who have been referred for resettlement to the United States.

You may write to [info.rsc@icmc.net](mailto:info.rsc@icmc.net) or call +90 212 219 2055 (Monday – Friday from 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information.

Please note the RSC will not be able to provide further information regarding the 120-day suspension at this time.”

17. My partner sent another email to ICMC on February 17th, and received the same email response on February 19th.

18. Since we received those emails from ICMC, I have received no information or communication from ICMC regarding our second interview.

### **III. Harm From March 6, 2017 Executive Order:**

19. I am aware that President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) that negatively impacts the refugee admissions process for citizens from certain countries, including Iran, effective March 16, 2017.

20. My partner checked the ICMC website after the March 6 Executive Order was signed. It stated that refugees who have not already been approved for admission to the United States and scheduled for departure — refugees like me and my partner — are impacted by the Executive Order.

21. I am currently in limbo and do not know what will happen with my USRAP application. If another Executive Order is signed that delays or blocks the refugee applications of Iranians to the USRAP, I will be unable to move to the United States with my partner. I am

unable to return to Iran for fear of being subjected to violence by the Iranian government. I also fear violence here in Turkey.

22. I fear that the U.S. government will retaliate against me because of my involvement in this lawsuit. I am concerned that my involvement will impact my acceptance in the Refugee Admission Program and harm my chances to be approved by the United States. I also fear persecution from the Iranian government if it were to become aware of my application for refugee status in the United States, or my involvement in this lawsuit.

I, Jane Doe #9, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 9 day of March, 2017, in Denizli, Turkey.

/s/ Jane Doe #9  
Jane Doe #9



## **EXHIBIT 11**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #10 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #10, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am a citizen of Iran currently living in the United States.

3. I was born in Iran and met and married my husband in Iran. My two sons were born in Iran.

4. While living in Iran, I felt unsafe. There are a lot of societal pressures on women in Iran. Women are expected to behave a certain way and dress a certain way and it is dangerous for them not to meet these expectations. There are also societal pressures on families. There were also other factors that made Iran a bad place to live: the pollution, and other health safety hazards. I was very concerned about the type of life my sons would be able to have in Iran.

5. My sister lives in Sweden. When I felt unsafe in Iran and experienced mental anguish as a result of these feelings, I confided in my sister. My sister is a Christian and she told me about Christian teachings and Christianity. Christianity began to appeal to me. However, I did not know any Christians in Iran, and while I lived in Iran I could not outwardly identify as a Christian.

6. I came to the United States in December 2015. I felt that God intended for me to come to the United States. I converted to Christianity in the United States. I now identify as Christian. I petitioned for asylum for me and my sons on the basis of religious persecution. I was granted asylum here in the United States.

7. I did not come to the United States for economic reasons. My husband and I were financially secure in Iran.

8. My husband remains in Iran. I fear that the Iranian government will do something to harm him because I am a Christian. I fear for my husband's safety. I also fear for my husband's health. Because he is in Iran without us, and life is difficult in Iran, I worry that his health will deteriorate and he will have a heart attack or another physical ailment.

9. My husband is a Muslim. However, he is not a practicing Muslim. I hope that he too will convert to Christianity. I am working on him to do so.

10. I submitted an I-730 Asylee Relative Petition on behalf of my husband recently.

**II. Harm Suffered Under January 27, 2017 Executive Order or any Subsequent Executive Order That Affects Relative Petitions:**

11. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) restricting entry into the United States for citizens from certain countries, including Iran.

12. If the January 27 Executive Order is enforced, or any subsequent Executive Order is issued which affects relative petitions, my plans to have my husband join his family in the United States will be ruined.

13. I am very anxious for my husband to join me and my sons in the United States. I worry for his safety and health every day. If my husband's petition is delayed, or worse, denied, I am not sure whether I will be able to deal with this fact emotionally. I am also concerned that my husband's health will deteriorate if he is unable to be reunited with his family here.

14. I cannot go back to Iran for fear of religious persecution. If my husband cannot join his family here, we will be separated indefinitely.

15. I fear that the U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned that my involvement will impact my husband's I-730 petition.

16. I declare that the statements I have made above have been correctly translated into English from Persian, as they have been read to me in their entirety and they are my true and correct statements.

I, Jane Doe #10, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 28 day of February, 2017, in San Jose, CA.

/s/ Jane Doe #10

Jane Doe #10

## **EXHIBIT 12**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #11 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #11, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am a dual citizen of Iran and France.

3. My father is a French citizen. He lives in Paris, France.

4. My mother is an Iranian citizen and a naturalized French citizen. My mother married my stepfather, who is a U.S. citizen, a year ago. They have lived in Los Angeles, California for the last few years. My mother is a legal permanent resident of the United States.

5. My cousins also live in the Los Angeles area.

6. My twin sister is currently in the Los Angeles area.

7. My mother's family lives in Iran. Many of my friends live in Iran as well.

8. I completed high school in France. After high school, I studied law at a French University. I made and still have many friends in France. During my studies, I completed an internship with the Consulate General of France in Los Angeles. I used the internship at the French Consulate to start building my professional network in the United States.

9. Upon completion of my law program in France, I applied and was accepted to Cornell University's Master of Laws (LLM) program. The LLM degree is an internationally recognized postgraduate law degree often pursued by those like me who hold an undergraduate law degree. LLM students are eligible to work in the United States, even without sponsorship by a specific employer, for one year after graduation. My LLM degree will also allow me to sit for the New York Bar Exam, which I plan to study for and take in July 2017.

10. In connection with my LLM program, I applied for and received an F-1 visa. My visa expires in June 2021. I came to the United States in August 2016 to start my LLM program. I will graduate from my program in May 2017.

11. At Cornell, I am a member of a legal assistance clinic. As part of this clinic, I am conducting an advocacy project focusing on January 27 Executive Order issued by President Trump banning citizens of seven predominantly Muslim countries from entering the United States. More specifically, the project explores the effects of the immigration ban on the



numerous Iranian students and scholars studying and researching in U.S. universities in the fields of science and technology, and its harmful consequences on the progress of American science. I created a questionnaire as part of this research, sent out to Iranian students and scholars from various universities across the country including Cornell University, University of California Berkeley, University of California Los Angeles, Stanford University and MIT. The data reveals that most of these Iranians are visa holders with a significant number of women. The data also reveals that most of these Iranians are in the United States as PhD candidates. The others are in their majority graduate students. Finally, the rest are either full-time professors or visiting professors. The majority of the individuals who filled out the questionnaire are in the field of electrical engineering. The majority of them have made publications. This shows their important contribution to the progress of science and technology.

12. I hope to gain employment with a private law firm when I graduate from Cornell. I have submitted applications to law firms specializing in corporate law, as well as entertainment law, on both the West and East coasts of the United States. I have also applied to positions at U.S. and British law firms with offices in France.

13. I have had several interviews with the offices of U.S. and British firms located in France.

14. My first choice would be to receive an offer to work at a law firm in the United States. I believe that my international background would be an asset to a firm with internationally-focused clients such as multinational corporations.

15. I would like to settle down in the United States in the long-term as well. I hope to apply for legal permanent resident status in the future.

## **II. Harm from March 6, 2017 Executive Order**

16. I am aware that President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) restricting entry into the United States for citizens from certain countries, including Iran.

17. This past winter I travelled to France to see my father. After visiting France I travelled to Iran to see my mother's family and to take care of administrative matters, such as renewing my Iranian passport and National Identity Document. I returned to the United States just a few days before the President Donald Trump's first January 27, 2017 Executive Order was signed. I was lucky. If I had returned a few days later, I would have been blocked from entering the United States.

18. I was planning on visiting my father for my upcoming spring break, but have chosen not to as I fear being denied entry to the United States.

19. If and when the March 6 Executive Order is enforced, it will prevent me from renewing my visa or applying for work authorization. I will be forced to leave the United States. If I leave the United States and am not able to receive a visa to re-enter, I will be separated from my mother, sister, and friends in Los Angeles indefinitely. My plans to apply for permanent legal residency in the United States will also be thwarted.

20. If I am not able to receive work authorization in the United States, my employment prospects will be diminished because prospective employers in the United States will not want to hire me.

21. I also fear that, because the March 6 Executive Order blocks me from receiving visas to enter the United States in the future, my employment prospects with any law firms with offices in France will also be diminished. Most of the jobs to which I am currently applying would require me to travel between the United States and other countries. The practice of law at

a firm that has multinational corporations as clients requires attorneys to travel abroad. I fear that if I am unable to travel, my chances of employment at such a law firm will be significantly diminished. Or, even if I am hired at such a firm, my ability to participate in many of the firm's cases — and, as a result, my ability to advance within the firm — will be severely hampered.

22. Even if I am somehow able to receive authorization to work in the United States, I also fear discrimination from employers who, due to the March 6 Executive Orders singling out the citizens of Iran, will generally not wish to hire Iranian-Americans or will feel that it is too risky to do so regardless of their legal status.

23. I fear that the U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned that my involvement will impact any future visa applications by me or my family, or that I will encounter problems when attempting to re-enter the United States after traveling abroad.

I, Jane Doe #11, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10 day of March, 2017, in Ithaca, NY.

/s/ Jane Doe #11

Jane Doe #11

## **EXHIBIT 13**

**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. *et al*, )

*Plaintiffs,*

v.

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.*

**DECLARATION OF JANE DOE #12 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #12, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen with legal permanent resident status in France. I am an F-1 student visa holder currently living in the United States and completing my sophomore year of my undergraduate degree at a four-year university.

3. While I was born in Iran, I spent most of my life in France and grew up in France. My immediate family lives in France or Iran. I decided to complete my college degree in the United States because I am interested in American culture and politics and wanted to experience life in the United States. I am planning to return to France to find a job after I complete my college degree.

4. I am required to renew my F-1 student visa, which is a multiple-entry visa, every two years.

5. In order to renew my visa, I have to travel to the U.S. embassy in Paris, France, because it is the embassy that issued my visa. I am planning to finish the current semester and travel to France during my summer vacation in 2017 to visit my family and renew my visa.

6. I am also planning to travel to France during my upcoming spring break to renew my French residency card. I am required to travel to France to renew my residency card in person within a specific time period; I am not able to travel to France any earlier or later than the specific time period allotted. If I do not travel to France during spring break, I will lose my legal permanent resident status in France.

## **II. Harm Suffered Under January 27, 2017 Executive Order**

7. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) restricting entry into the United States for citizens from certain countries, including Iran.

8. When I learned that the President was planning to sign an Executive Order that might impact visa-holders from Iran, I contacted an organization that provides assistance for international students and asked how the Executive Order would impact me. The organization told me to contact the Iranian embassy, which in turn referred me to the U.S. embassy in France.

I called the U.S. embassy in France multiple times, and no one could give me a clear answer as to how the Executive Order impacted my student visa.

9. The week after the Executive Order was signed, my university sent an email to all the students on campus explaining that over 50 Iranian students and over 20 Iranian scholars were being impacted by the Executive Order. The university also made counselors and other therapeutic resources available to students like me who were impacted by the Executive Order.

### **III. Harm from March 6, 2017 Executive Order**

10. I am also aware that President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

11. As a result of the March 6 Executive Order, I am very concerned that I will be unable to complete my college degree in the United States. If and when the March 6 Executive Order is enforced, I will be unable to receive a new F-1 visa when I travel to Paris, France this summer. If I do not renew my F-1 visa as required I will be unable to return to the United States to complete my studies.

12. I will suffer greatly if I do not complete my degree in the United States. I have invested significant time, resources, and money into my current degree. I have already signed a lease in the United States for the coming school year. Because I am studying American politics, it is likely that I will not be able to transfer many of my course credits and I will have to essentially start a new college degree. I would likely have to apply to a university in Europe, but, since the application deadlines have already expired for this year, I would not be able to begin studying at a European university until 2018. I would essentially lose three years of studying—the two years that I spent in the United States and the year that I would have to wait before I could begin my studies in Europe. Being forced to abandon my studies after two years will also



negatively impact my job prospects. I will likely be a less desirable job applicant and it will negatively reflect on my grades.

13. I fear that the U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned that my involvement will impact any future visa applications by me or my family, or that I will encounter problems when attempting to re-enter the United States after traveling abroad.

I, Jane Doe #12, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this   10   day of March, 2017, in Davis, CA.

/s/ Jane Doe #12

Jane Doe #12

## **EXHIBIT 14**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JANE DOE #13 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #13, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen and lawful permanent resident of the United States. My parents and sister are also Iranian citizens and live in Iran.

3. I am a Muslim. My parents and sister are also Muslim.

4. I grew up in Iran and completed my undergraduate education there. I was a political activist during the Green Movement in Iran.

5. I first arrived in the United States in 2010 on an F-1 student visa in order to enroll in a graduate degree program. While working toward my graduate degree, I learned that the government of Iran had tried and convicted me in absentia on the basis of my previous political actions. As a result, I am unable to ever return to Iran.

6. I received asylum in the United States in December 2011. In a few months, I will become eligible to seek U.S. citizenship.

7. My parents have visited me in the United States twice in the past seven years. My mother and father both visited me in 2011, and my mother visited me in 2014 as well.

8. Each time my parents intended to visit the United States, I provided them with, among other things, documentation of my legal status as an asylee as well as a letter of invitation. They submitted these documents along with their visa application. My parents successfully applied for and received tourist visas from the U.S. Consulate in Dubai in 2011 and my mom successfully applied for and received a tourist visa from the U.S. Consulate in Dubai in 2014.

9. The officials at the U.S. Consulate in Dubai did not ask my parents any questions about my religion or their religion in either 2011 or 2014.

10. After I became engaged to be married to a U.S. citizen, my parents planned to come to the United States for my wedding. I greatly looked forward to seeing them and began making plans for my wedding ceremony. I expected that they would be able to obtain tourist visas as they had done in the past.

11. My parents applied for a tourist visa. This time, I provided them with far more supporting documentation than I had provided for their visa applications in either 2011 or 2014. My fiancé's parents, who are U.S. citizens by birth and not of Iranian descent, provided my parents with letters of invitation, as did my fiancé. I provided them with a letter of invitation, documents showing my finances, and documents evidencing my legal status as an asylee and lawful permanent resident, among other things. My parents received an appointment date for their visa interview.

## **II. Harm Suffered Under January 27, 2017 Executive Order**

12. I am aware that on January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) immediately restricting entry into the United States for citizens from certain countries, including Iran.

13. My parents received an email stating that their visa appointment had been cancelled. After a federal court preliminarily enjoined the January 27 Executive Order, my parents' appointment was rescheduled.

14. After the federal court's preliminary injunction of the January 27 Executive Order but before President Donald Trump signed a new Executive Order on March 6, 2017 (March 6 Executive Order), my parents traveled to Dubai for their appointment and interview.

15. In response to the questions of the consular officials, my parents said that they were traveling to visit me for my wedding, and that I was an asylee and lawful permanent resident of the United States.

16. My parents reported to me that the consular officials became visibly upset when they heard that I was an asylee. They then asked my parents if they intended to apply for asylum. My parents assured the consular officials that they did not intend to apply for asylum; that they

had successfully obtained tourist visas in the past; that they had returned to Iran each time after visiting me in 2011 and 2015; that they had every intention of returning to Iran after my wedding; that they were happy with their life in Iran; and that their other daughter, my sister, lived in Iran.

17. The consular officials stated that they did not understand how I had entered the United States and that I was not “in the system.”

18. The consular officials then asked, “what is your daughter’s religion?”

19. My parents were surprised because they had never before been asked a question about religion during a tourist visa interview. They replied that I was a Muslim.

20. At the conclusion of the interview, my parents’ application for a tourist visa was denied. The consular officials gave no basis for the denial.

21. My mother informed me that a couple who were in a substantially similar position— also applying for a tourist visa to a visit a relative and asylee in the United States — were approved for a tourist visa on the same day that my parents’ tourist visa was denied. The other couple was being interviewed next to my parents. Their interview, like that of my parents, was conducted in Farsi and my mother was able to overhear the couple’s responses to the interviewer’s questions. My mother gleaned from their conversation that there was one significant difference between their application and hers: the other couple were Armenian Christians, while my parents are Muslim.

### **III. Harm from March 6, 2017 Executive Order**

22. I am aware that President Donald Trump signed an Executive Order on March 6, 2017 prohibiting the issuance of visas to Iranian citizens.

23. If and when the March 6 Executive Order is enforced, my parents will be unable to re-apply for and receive a tourist visa. As a result of the March 6 Executive Order, I am very concerned that my parents will be unable to attend my wedding in the United States, or that they will never be able to visit me and my fiancé in the United States.

24. My fiancé and I have already been forced to postpone our wedding plans and contemplate significant changes to the ceremony. It is not possible for us to get married in Iran because it is not safe for me to return to Iran. We could plan to have a wedding ceremony in Europe or elsewhere, but that will require my fiancé's American family to travel abroad. Or, if we proceed with a wedding in the United States, my parents will be unable to attend.

25. The thought that I will be unable to have my parents at my wedding, or that I will be unable to host them in my home in the future, is crushing. It has caused me great mental anguish.

26. I fear that the U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned that my involvement will impact any future visa applications by my family or my imminent naturalization proceedings.



I, Jane Doe #13, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 13 day of March, 2017, in Washington DC.

/s/ Jane Doe #13

Jane Doe #13

## **EXHIBIT 15**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JOHN DOE #1 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #1, 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.

**I. Background:**

2. I am an Iranian citizen. I first arrived in the United States on an F-1 student visa in 2015. My visa expires on June 7, 2017. My wife accompanied me on an F-2 visa for spouses of students. Her visa expires on July 30, 2017.

3. Both of our visas are multiple-entry visas.

4. I do not have any family in the United States. My entire family, as well as my wife's family, lives in Iran.

5. In September 2015, I started a PhD program in Finance and Economics at Columbia University in New York, NY. While the program is formally five years long, most candidates typically take six years to complete their PhDs. I am currently in the second year of my PhD program.

6. My wife has a PhD in electrical engineering from the University of British Columbia in Vancouver, Canada. She has completed research on the newest generation of wireless communication systems and on energy harvesting and working toward more sustainable energy systems. She is a published author in the journal of the Institute of Electrical and Electronics Engineers (IEEE), the most prominent journal in the field of electrical engineering.

7. When we moved, my wife was planning to apply for a green card so that she could secure employment in her field in the United States. We paid \$2,000.00 to retain an immigration attorney for the first phase of her green card application.

**II. Harm Caused by the January 27, 2017 Executive Order:**

8. On or about December 24, 2016, my wife and I flew to Iran to visit our families.

9. On or about January 22, 2017, I flew back to the United States. My wife was planning to join me later that week and had purchased a ticket for a January 28, 2017 Turkish Airlines flight from Esfahan, Iran to New York, NY.

10. On January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) preventing the entry of Iranian visa holders as well as others into the United States.

11. My wife attempted to board her flight on January 28, but was prevented from boarding by Turkish Airlines, citing the January 27 Executive Order.

12. On or about January 30, 2017, my wife attempted to board a flight from Tehran, Iran to the United States, but was again turned away by the airline and not permitted to board.

13. My wife was unable to successfully board a flight and enter the United States until February 4, 2017.

**III. Harm From March 6, 2017 Executive Order:**

14. President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

15. The visas upon which my wife and I entered the United States expire this summer. If and when the March 6 Executive Order is enforced, we will be unable to renew our visas. Because we will be unable to renew our visas we will be unable to travel outside of the United States. As a result, my wife and I will be separated indefinitely from our families in Iran.

16. If I am forced to return to Iran for a family emergency or due to other circumstances while the March 6 Executive Order is enforced, and if any new visa application I submit is denied, I will be forced to drop out of my U.S. PhD program.

17. If I am forced to return to Iran permanently I will likely be unable to complete my PhD studies and it will be very difficult for me to find employment. I protested against the Iranian government during the Green Movement after the 2009 Iranian presidential election. I was detained for thirty days while I was an undergraduate student. As a result of my political activity, I was permanently enjoined from studying in Iran by the Iranian government.

18. In my opinion, it is very unlikely that the ban on entry will be lifted pursuant to its own terms as to individuals from Iran. The March 6 Executive Order requires the Secretary of Homeland Security to produce a list of countries that “do not provide adequate information” to adjudicate visas and other admissions. It is likely that Iran will be on that list, and very unlikely that Iran and the United States will reach agreement regarding the information that needs to be

provided. Thus, I believe that the prohibition on entry of Iranian nationals into the United States will become permanent.

19. I am joining this lawsuit as an anonymous plaintiff because various government agencies are named as Defendants, and I am scared of retaliation and consequences against me and my wife if I reveal my identity.

I, John Doe #1, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10 day of March, 2017, in New York, NY.

\_\_\_\_\_  
/s/ John Doe #1  
John Doe #1

## **EXHIBIT 16A**



**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. *et al*,

*Plaintiffs,*

v.

Donald J. Trump, President of the United States,  
*et al.*

*Defendants.*

Civil Action No. \_\_\_\_\_

**DECLARATION OF JOHN DOE #3 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #3, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen. My immediate family lives in Iran.
3. My wife is an Iranian citizen.
4. We currently live in Tehran, Iran.
5. My wife and I are practicing Muslims.

6. I hold a PhD in Pharmacology as well as a Doctorate of Pharmacy from a leading university in Iran. I graduated at the top of my class in each program.

7. I am currently a resident of Pharmacology at a university in Tehran, Iran.

8. I have published extensively in the field of pharmacology. Since 2007, I have been lead author or coauthor on over 40 articles in leading scientific journals.

9. This past year, I was awarded a fellowship by my university to study at a top-ranked hospital in Boston, Massachusetts. The fellowship has a term of three years. The fellowship had a start date of December 1, 2016.

10. The fellowship allows me to conduct research on diabetes effects on the heart in the lab of a professor of medicine and biochemistry at an ivy league medical school and a senior physician in cardiovascular medicine at the hospital.

11. In connection with my fellowship, I petitioned for a J-1 visa. I petitioned for a J-2 visa for my wife at the same time.

12. My wife and I had a visa interview on October 12, 2016 in the U.S. Consulate in Dubai.

13. Subsequent to the interview, I received an email instructing me to bring my passport to the U.S. Consulate in Dubai in order for my J-1 visa to be issued.

14. At that time, my wife's email was still under administrative processing. As a result, I successfully petitioned to have the start date of my fellowship changed to February 2017.

**II. Harm Suffered Post January 27, 2017 Executive Order:**

15. I learned from news reports that on January 27, 2017, President Trump signed an Executive Order (EO) preventing the entry of Iranian visa holders as well as others into the United States.

16. I travelled to the U.S. Consulate in Dubai on February 1, 2017, in order to get the J-1 visa placed into my passport.

17. When I arrived at the Consulate in Dubai, the Consulate officials told me that they were prohibited from issuing my visa due to the EO. They instructed me that I had to go back to Tehran.

18. I travelled back to Tehran from Dubai. My wife and I are still in Tehran.

19. At present, the EO makes it impossible for me to travel to the United States. If I am unable to travel to the United States, I will be unable to participate in my fellowship at the hospital.

20. The EO has completely upended my career plans, as well as my family's plans to move to the United States.

21. I am in close contact with the physician who runs the lab in which I was planning to work. We exchange emails on a daily basis with updates on my situation and the EO.

22. I have learned from the physician that they would have great difficulty finding a suitable replacement on short notice. In fact, he told me that he is very eager for me to join them and will consider it a great loss to his lab if I am not able to do so.

23. I am choosing to participate in this action anonymously because I am afraid of what the U.S. government may do if I join this lawsuit as a named plaintiff, especially if this lawsuit is not successful in overturning the EO. I fear that the U.S. government may retaliate

against me by continuing to deny issuance of my visa, and/or failing to grant future visas for me and my wife if they find out that I have publicly opposed the EO.

I, John Doe #3, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 7 day of February, 2017, in Tehran, Iran.

/s/ John Doe #3

John Doe #3

## **EXHIBIT 16B**

**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. 17-cv-255
	)	
Donald J. Trump, President of the United States,	)	
<i>et al.</i>	)	
	)	
	)	
<i>Defendants.</i>	)	

**SUPPLEMENTAL DECLARATION OF JOHN DOE #3 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Jane Doe #1, 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. My wife and I currently reside in Tehran, Iran.
3. This declaration supplements the declaration executed on February 7 and already filed with this Court to update the record of ongoing harm and impact resulting from the January 27, 2017, Executive Order, "Protecting the Nation from Foreign Terrorist Entry Into the United States" (the "Executive Order").
4. Prior to the Executive Order, I was awarded a fellowship to conduct research at a top hospital in Boston, Massachusetts, and planned to start my fellowship in February 2017.
5. I petitioned for a J-1 visa for myself, and a J-2 visa for my wife at the same time.

We both had our visa interviews on October 12, 2016 at the U.S. Consulate in Dubai. Some time after the interview, my visa was approved. My wife's visa petition was placed in administrative processing.

6. Due to the intervention of the Executive Order, the U.S. Consulate in Dubai refused to issue my visa. My wife's visa petition remained in administrative processing after the Executive Order was signed.

7. I called the U.S. Consulate in Dubai to ask about the status of my J-1 visa and my wife's J-2 visa, but the Consulate did not provide me with any answers.

8. As a result of the Executive Order, I was forced to push back the start date of my fellowship to March 2017.

9. Not until the weekend of February 25-26, 2017, did I receive an email from the U.S. Embassy in Dubai instructing me to drop off my passport for the issuance of my J-1 visa. I have made arrangements to ensure that the visa is stamped into my passport.

10. However, my wife's visa petition remains in administrative processing. Even if my visa is issued, but my wife's visa is not approved and issued, I will have to face the decision of being separated from my wife, or withdrawing from my fellowship.

11. Even if my visa and my wife's visas are issued, and we are able to travel to the United States for my fellowship, I fear that we will be unable to travel outside of the United States due to our status as J-1 and J-2 visa holders. If we are unable to travel, we will be unable to see our families in Iran.

12. I am also concerned that, as a result of the Executive Order, I will be unable to renew my work authorization in the United States in the future. I also fear that my wife and I will be unable to petition for legal permanent residency in the United States in the future.



I, John Doe #3, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 25 day of February, 2017, in Tehran, Iran.

/s/ John Doe #3

John Doe #3

## **EXHIBIT 17**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF JOHN DOE #5,  
ON BEHALF OF HIMSELF AND HIS MINOR CHILD BABY DOE #1,  
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #5, on behalf of himself and his minor child Baby Doe #1, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

2. My son is Baby Doe #1. He is a minor approximately 7 months old.

**I. Background:**

3. I am an Iranian citizen. I entered to United States in September 2009 on an F-1 student visa. I have been studying and working in the United States since then. I received a Masters Degree in mechanical engineering in 2012 from the University of Buffalo in New York,

and in 2015 I received my PhD in mechanical engineering from the University of Buffalo. I am currently working as a post-doctoral fellow with the SUNY Research Foundation. After entering the United States on an F-1 visa in 2009, I returned to Iran two times. Once in 2012 because I had a family emergency, and again in 2013 to be married to my wife. Both times I applied for and received a valid F-1 visa to return to the United States. I was interviewed and had to pass a lengthy security clearance all three times I applied for an F-1 student visa.

4. The F-1 visa on which I entered the United States most recently was a single-entry F-1 visa. It has expired.

5. I live with my wife and our infant son, Baby Doe #1, in New York. After we were married in 2013, my wife traveled with me to the U.S. with a valid F-2 visa, which is available for dependents of F-1 visas.

6. My son was born in the United States in August 2016. He has both a United States and Iranian passport.

7. On January 4, 2017, my wife and son traveled to Iran to introduce my son to our family in Iran. Most of my family is in Iran and my parents and in-laws in particular were very excited to meet my son, as he is currently their only grandchild. My wife and son were planning to stay in Iran for several months so that everyone in our families could meet my son. I purchased a plane ticket for my wife and son to fly back to the United States on or about April 4, 2017.

8. Before my wife left for Iran, we scheduled an appointment at the U.S. consulate in Dubai on January 17, 2017 for my wife to apply for a new F-2 visa. My wife had to travel from Tehran to Dubai for the interview and was unable to take our son on her journey to Dubai. My wife was interviewed at the U.S. consulate and provided all the necessary documentation.

The U.S. consulate approved her F-2 visa request that same day, January 17, 2017. My wife left Dubai immediately after her interview because she needed to return to our son in Iran.

## **II. Harm Suffered Post January 27, 2017 Executive Order:**

9. After an F-2 visa is approved by the U.S. consulate, it takes several days to process the paperwork and issue the F-2 visa. On January 26, 2017, at approximately 2:00 a.m., I received an email from the U.S. consulate stating that my wife's F-2 visa was ready to be issued and asking my wife to bring her passport to the U.S. consulate. Shortly afterwards, my wife made arrangements for an agency in Iran to take her passport to the U.S. consulate and issue her F-2 visa. Agencies like this are very common in Iran and are often used by individuals like my wife, who are unable to stay in Dubai while consulate takes several days to issue the visa after it is approved. These agencies typically take about 4 to 5 days to travel to Dubai, receive the visa, and return the passport.

10. On January 27, 2017, President Trump signed an Executive Order (January 27 Executive Order) preventing the entry of Iranian visa holders and others into the United States.

11. Because of the January 27 Executive Order, the U.S. consulate refused to issue the F-2 visa to my wife, even though the visa had already been approved. The agency that my wife hired to take her passport to Dubai returned her passport without the visa. My wife and I were extremely anxious about her and my son's return to the United States.

12. My wife and I continued to try and contact the U.S. consulate to find out how it refused to issue her visa and how my wife could obtain her visa. My son is too young to travel on his own so in order to return to the United States he had to return with my wife. After a federal district judge in Washington temporarily restrained enforcement of the January 27

Executive Order, my wife contacted the U.S. consulate on February 4, 2017, seeking clarification about the status of her F-2 visa.

13. After much effort on our part, my wife's visa was issued. The U.S. Consulate in Dubai issued her a single-entry F-2 visa which was set to expire immediately upon her entry into the United States.

14. My wife and my son were able to travel to the United States on February 19, 2017. We had to pay an additional \$400 to change the date of her plane ticket.

### **III. Harm From March 6, 2017 Executive Order:**

15. President Donald Trump signed an Executive Order on March 6, 2017 (March 6 Executive Order) prohibiting the issuance of visas to Iranian citizens.

16. The terms of the March 6 Executive Order prohibit the issuance of visas to Iranian citizens like me and my wife. If and when the Executive Order goes into effect, my wife and I will be unable to travel outside of the United States because we will be unable to receive new visas to reenter the United States. As a result, my wife, son and I will face indefinite separation from our families in Iran.

17. I will also risk losing my job if I travel outside the United States and am barred from reentry due to my inability to receive a new visa.

18. I fear that U.S. government will retaliate against me and my family because of my involvement in this lawsuit. I am especially concerned about any future visa applications that my wife and I wish to submit, or any treatment that we may face at the border to the United States when we do travel.

I, John Doe #5, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 13 day of March, 2017, in Amherst, NY.

/s/ John Doe #5  
John Doe #5, on behalf of himself  
and his minor child, Baby Doe # 1

## **EXHIBIT 18A**



**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. *et al.*, )

*Plaintiffs,*

v.

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.*

Civil Action No. \_\_\_\_\_

**DECLARATION OF JOHN DOE #7 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #7, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I have been in a loving committed relationship with my partner, John Doe # 8, for many years. My partner and I were both born and raised in Iran. Both of us also grew up in

Muslim households. The Muslim community in Iran has not been accepting of our sexual orientation.

4. My partner and I lived together in Iran for eight years. Because of this, we experienced harassment from the Iranian people. Most or all of this harassment stemmed from religious intolerance for same-sex couples in Iran. Our neighbors were suspicious of us because we were two men living together. On several occasions our neighbors reported us to the Iranian police. We lived in constant fear that we would be taken by government officials, who tolerate and even encourage violence against same-sex couples in Iran. I have heard of homosexual men being arrested and beaten in Iranian prisons. We stopped answering the door because we were very afraid of the police coming to arrest us. The harassment also made us feel unwanted in Iran. We were forced to move at least three different times because either landlord or the neighbors complained. The harassment was so strong that we constantly feared for our safety and were forced to flee Iran.

5. My partner and I have been living in exile in Turkey for approximately 27 months. Our life in Turkey has been very difficult. We live in a small town where many people do not accept our relationship and we live in fear of violence against us. In this atmosphere, we are constantly afraid for our safety. Both my partner and I worked full time when we lived in Iran. We are not allowed to work in Turkey.

6. My partner is very ill. He was diagnosed with colitis and he experiences a lot of physical pain. Our sub-standard living conditions worsen his health conditions. We need to go to a country where he can recover and we can get adequate medical care.

7. My partner and I are in a terrible situation. Because of our sexual orientation, we were unsafe in Iran and are unsafe in Turkey. We have applied for refugee status and would like

to be resettled to the United States where we will be safe from persecution and where my partner can receive treatment for his medical condition. We reached out to the Office of the UN High Commissioner for Refugees (UNHCR) after we arrived in Turkey and told them we wished to be referred to the U.S. Refugee Admissions Program. After a lengthy interview and vetting process, UNHCR agreed to our application for refugee status, gave us documentation of that approval, and referred us to the U.S. Refugee Admissions Program. We are now waiting for the decision of the United States on acceptance to the program. We know that the United States Refugee Admissions Program has admitted to the program many same-sex applicants and are waiting to be processed. It has been approximately 120 days since we received the certificates from the UN and referral to the US admissions program.

**II. Harm Suffered Post January 27, 2017 Executive Order:**

8. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) that impacts the refugee admissions process for citizens from certain countries, including Iran.

9. My partner and I check the website icmc.net, a website referred to us by the United Nations, nearly every day to keep track of our status in the U.S. refugee admissions process. After the EO was signed, the website posted a notice informing us that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the EO.

10. The EO has caused us great distress. My partner and I are very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program.

11. Since the EO was issued my partner's health has severely worsened. He is not able to obtain the medical care needed where we live now. I also fear that his health will continue to decline because we are experiencing so much anxiety and uncertainty surrounding the EO and its impact on our refugee applications.

12. My partner and I fear that U.S. government will retaliate against us because of our involvement in this lawsuit. We are concerned that our involvement will impact our acceptance in the Refugee Admission Program and harm our chances to be approved by the United States. We also fear persecution from the Iranian government if it were to become aware of our application for refugee status in the United States, or our involvement in this lawsuit.

I, John Doe #7, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of February, 2017, in Denizli, Turkey.

/s/ John Doe #7

John Doe #7

## **EXHIBIT 18B**

**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. *et al*, )

*Plaintiffs,* )

v. )

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

Civil Action No. 17-255

**SUPPLEMENTAL DECLARATION OF JOHN DOE #7  
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #7, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

2. This declaration supplements the declaration I, John Doe #7, previously submitted in support of Plaintiffs' Motion for Preliminary Injunction filed with the Court on February 8, 2017.

3. The Executive Order signed by President Trump on January 27, 2017, continues to cause my partner, John Doe #8, and I great distress. Since submitting our prior declarations, we still have not received any notifications from the U.S. government or its affiliates regarding the status of our applications to be admitted to the U.S. Refugees Admissions Program. We

continue to be very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program. My partner's health continues to worsen because of the ongoing stress, anxiety, and uncertainty surrounding the Executive Order and its impact on our refugee applications. He is still unable to obtain the medical care needed where we live now.

4. As of February 17, 2017, the International Catholic Migration Commission (ICMC) was responding to email inquiries about the status of refugee applications with the following message: "As stated in the Executive Order signed by the President, the United States government has suspended all refugee admissions for 120 days effective January 27, 2017. The Resettlement Support Center (RSC) Turkey and Middle East (TuME) will continue to maintain all case information and biodata on file for all refugees who have been referred for resettlement to the United States. You may write to [info.rsc@icmc.net](mailto:info.rsc@icmc.net) ; call Istanbul office at +90 212 219 2055 or call Beirut office at +961 1 612245/ +961 1 612246 (Monday-Friday between 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information. Please note the RSC will not be able to provide further information regarding the 120-day suspension at this time."

5. My partner and I continue to check the International Catholic Migration Commission (ICMC) website every day. On or about February 23, 2017, the ICMC website had been updated to state, "Case status information is currently unavailable. Please contact RSC TuME at [info.rsc@icmc.net](mailto:info.rsc@icmc.net); call Istanbul office at +90 212 219 2055 or call Beirut office at +961 1 612245/ +961 1 612246 (Monday-Friday between 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information."



I, John Doe #7, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 28 day of February, 2017, in Denizli, Turkey.

/s/ John Doe #7  
John Doe #7

## **EXHIBIT 19A**

**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. *et al.*, )

*Plaintiffs,*

v. )

Civil Action No. \_\_\_\_\_

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.*

**DECLARATION OF JOHN DOE #8 IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #8, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

**I. Background:**

2. I am an Iranian citizen currently living in Turkey and seeking to be admitted to the United States as a refugee.

3. I have been in a loving committed relationship with my partner, John Doe # 7, for many years. My partner and I were both born and raised in Iran. Both of us also grew up in

Muslim households. The Muslim community in Iran has not been accepting of our sexual orientation.

4. My partner and I lived together in Iran for eight years. Because of this, we experienced harassment from the Iranian people. Most or all of this harassment stemmed from religious intolerance for same-sex couples in Iran. Our neighbors were suspicious of us because we were two men living together. On several occasions our neighbors reported us to the Iranian police. We lived in constant fear that we would be taken by government officials, who tolerate and even encourage violence against same-sex couples in Iran. I have heard of homosexual men being arrested and beaten in Iranian prisons. We stopped answering the door because we were very afraid of the police coming to arrest us. The harassment also made us feel unwanted in Iran. We were forced to move at least three different times because either landlord or the neighbors complained. The harassment was so strong that we constantly feared for our safety and were forced to flee Iran.

5. My partner and I have been living in exile in Turkey for approximately 27 months. Our life in Turkey has been very difficult. We live in a small town where many people do not accept our relationship and we live in fear of violence against us. In this atmosphere, we are constantly afraid for our safety. It has been very difficult for us to find employment.

6. I am very ill. I was diagnosed with colitis and experience a lot of physical pain. Our sub-standard living conditions worsen my health conditions. We need to go to a country where I can recover and get adequate medical care.

7. My partner and I are in a terrible situation. Because of our sexual orientation, we were unsafe in Iran and are unsafe in Turkey. We have applied for refugee status and would like to be resettled to the United States where we will be safe from persecution and where I can

receive treatment for my medical condition. We reached out to the Office of the UN High Commissioner for Refugees (UNHCR) after we arrived in Turkey and told them we wished to be referred to the U.S. Refugee Admissions Program. After a lengthy interview and vetting process, UNHCR agreed to our application for refugee status, gave us documentation of that approval, and referred us to the U.S. Refugee Admissions Program. We are now waiting for the decision of the United States on acceptance to the program. We know that the United States Refugee Admissions Program has admitted to the program many same-sex applicants and are waiting to be processed. It has been approximately 120 days since we received the certificates from the UN and referral to the US admissions program.

**II. Harm Suffered Post January 27, 2017 Executive Order:**

8. I am aware that, on January 27, 2017, President Trump signed an Executive Order (EO) that impacts the refugee admissions process for citizens from certain countries, including Iran.

9. My partner and I check the website icmc.net nearly every day to keep track of our status in the U.S. refugee admissions process. After the EO was signed, the website posted a notice informing us that refugees and refugee applicants from Iran pending admission to the U.S. program could not travel to the United States due to the EO.

10. The EO has caused us great distress. My partner and I are very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program.

11. Since the EO was issued my health has severely worsened. I am unable to obtain the medical care needed where we live now. The anxiety and uncertainty surrounding the EO

and its impact on our refugee applications has also caused my health to worsen because of the additional stress.

12. My partner and I fear that U.S. government will retaliate against us because of our involvement in this lawsuit. We are concerned that our involvement will impact our acceptance in the Refugee Admission Program and harm our chances to be approved by the United States. We also fear persecution from the Iranian government if it were to become aware of our application for refugee status in the United States, or our involvement in this lawsuit.

I, John Doe #8, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 8th day of February, 2017, in Denizli, Turkey.

/s/ John Doe #8  
John Doe #8

## **EXHIBIT 19B**



**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. *et al*, )

*Plaintiffs,* )

v. )

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

Civil Action No. 17-255

**SUPPLEMENTAL DECLARATION OF JOHN DOE #8  
IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, John Doe #8, hereby declare and state as follows:

1. I am over the age of eighteen years, and 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. If asked to do so, I could testify truthfully about the matters contained herein.

2. This declaration supplements the declaration I, John Doe #8, previously submitted in support of Plaintiffs' Motion for Preliminary Injunction filed with the Court on February 8, 2017.

3. The Executive Order signed by President Trump on January 27, 2017, continues to cause my partner, John Doe #7, and I great distress. Since submitting our prior declarations, we still have not received any notifications from the U.S. government or its affiliates regarding the status of our applications to be admitted to the U.S. Refugees Admissions Program. We

continue to be very concerned about whether we will ever be approved by the United States to participate in the Refugee Admissions Program. My health continues to worsen because of the ongoing stress, anxiety, and uncertainty surrounding the Executive Order and its impact on our refugee applications. I am still unable to obtain the medical care needed where we live now.

4. As of February 17, 2017, the International Catholic Migration Commission (ICMC) was responding to email inquiries about the status of refugee applications with the following message: “As stated in the Executive Order signed by the President, the United States government has suspended all refugee admissions for 120 days effective January 27, 2017. The Resettlement Support Center (RSC) Turkey and Middle East (TuME) will continue to maintain all case information and biodata on file for all refugees who have been referred for resettlement to the United States. You may write to [info.rsc@icmc.net](mailto:info.rsc@icmc.net) ; call Istanbul office at +90 212 219 2055 or call Beirut office at +961 1 612245/ +961 1 612246 (Monday-Friday between 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information. Please note the RSC will not be able to provide further information regarding the 120-day suspension at this time.”

5. My partner and I continue to check the International Catholic Migration Commission (ICMC) website every day. On or about February 23, 2017, the ICMC website had been updated to state, “Case status information is currently unavailable. Please contact RSC TuME at [info.rsc@icmc.net](mailto:info.rsc@icmc.net); call Istanbul office at +90 212 219 2055 or call Beirut office at +961 1 612245/ +961 1 612246 (Monday-Friday between 13:00-15:00) with questions or if you wish to provide information on emergency situations or update your contact information.”

I, John Doe #8, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 28 day of February, 2017, in Denizli, Turkey.

/s/ John Doe #8

John Doe #8

## **EXHIBIT 20**

**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. *et al*, )

*Plaintiffs,* )

v. )

Civil Action No. 17-255

Donald J. Trump, President of the United States, )  
*et al.* )

*Defendants.* )

**DECLARATION OF RICHARD M. PETTIGREW IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Title 28 U.S.C. Section 1746, I, Richard M. Pettigrew, PhD, RPA, declare and state as follows:

1. I am over the age of eighteen years, and I have personal knowledge of the facts set forth here or believe them to be true based on my experience or upon information provided to me by others. If asked to do so, I could testify truthfully about the matters contained here.

2. I am an established consulting archaeologist in Eugene, Oregon, with 43 years of experience in western North America. I have a Ph.D. in Anthropology from the University of Oregon and am a Registered Professional Archeologist. I have written, taught and conducted research on hundreds of projects in the Pacific Northwest in both the academic and private sectors and I have published numerous technical works. In 2006, I received the Society for

American Archaeology Award for Excellence in Public Education, in recognition of my worldwide leadership in public education about archaeology and cultural heritage.

3. I am the founder and Executive Director and President of Archaeological Legacy Institute, a 501(c)(3) nonprofit corporation in Eugene, Oregon. My duties include managing the annual ***The Archaeology Channel*** International Film Festival in Eugene, now in its 14<sup>th</sup> year. I am also an experienced producer of cultural heritage films and I have served on film festival juries in France, Germany, Iran, and Italy.

4. The Festival, scheduled for May 3-6, 2017, features 4 days of screenings of juried films and videos on archeological and indigenous topics, followed by an awards reception.

5. In recent years, we have added a three-day conference (***The Archaeology Channel*** Conference on Cultural Heritage Media), for presentations, discussions, and exhibits on cultural heritage media covering the same time period. This conference is an unparalleled worldwide networking opportunity for cultural heritage film makers, including writers, directors, producers, broadcasters, and distributors, to engage with each other and with those interested in the making and uses of cultural heritage media – including archaeologists, educators, artists, journalists, and indigenous organizations.

6. Through the Festival and the Conference, Archaeological Legacy Institute seeks to promote, study and preserve cultural heritage.

7. This year, our Festival and Conference are suffering significant harmful impacts from President Trump's executive orders which have the purpose and effect of barring individuals traveling to the United States from majority-Muslim countries, including Iran, for no other reason than their identity as nationals of majority-Muslim countries. These include the January 27, 2017, Executive Order, "Protecting the Nation from Foreign Terrorist Entry Into the

United States” (“January 27 Executive Order”) and the subsequent March 6, 2017, Executive Order of the same name (“March 6 Executive Order”) expected to go into effect on March 16.

8. In 2017, there are six Iranian citizens and one citizen of Libya who are planning to attend whose participation is currently foreclosed due to these executive orders. All but one (the Libyan) have applied for visas and completed their interviews, but have yet to receive their visas. They have been told their applications are undergoing “administrative processing” – a further step that the state department sometimes requires, and which can take up to 60 days to complete. The current restrictions imposed by the January 27 Executive Order have been lifted by the courts and their applications have been proceeding up until now. But on March 16, when the March 6 Executive Order goes into effect, new restrictions will apply that may make it impossible for them to come. Because the Conference is less than 8 weeks away, there is very little time to determine whether they are eligible for a waiver and to complete that process – which will impose an unknown period of delay and has no guarantee of success. The March 6<sup>th</sup> Executive Order places unusual burdens and uncertainties on them by requiring this separate and extra process due to their national origin.

9. From my perspective, the prospects for their participation are dismal.

10. This will have negative impacts on our event, our partners, and the local Eugene economy. Two of our Iranian guests are financially sponsored by a State Department cultural exchange program, and we also been awarded a grant from a consortium of universities to support their participation, in order to facilitate cultural exchange. Those grants will be wasted if the individuals cannot obtain visas.

11. One participant who is a film producer and investor from Shiraz has committed to providing a \$1000 sponsorship, which will be lost to us if that person is unable to obtain a visa

and travel to the United States. We also will face the loss of these participants' registration fees, and Eugene will lose economic opportunities if they cannot reserve hotel rooms and cannot attend and spend money locally.

12. Beyond the financial losses, we will lose their intangible academic and professional contributions to our Conference, including lost opportunities to develop and support our worldwide network and experience important cultural exchange. Our program's mission has been stymied by these executive orders.

13. I am also fearful that Iran may decide to block travel by Americans in retaliation. We are planning a tour of Iran for Americans in October and I am concerned about whether that trip will be able to go forward.



I, Richard M. Pettigrew, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10<sup>th</sup> day of March, 2017, in Eugene, OR.

  
Richard M. Pettigrew, PhD, RPA