

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

Pars Equality Center,)
Iranian American Bar Association,)
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 ABOLFAZL KOWSARI IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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

1. My name is Abolfazl Kowsari. 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 and a lawful permanent resident of the United States. I arrived in the United States in 2002 on a Diversity Immigrant Visa along with my wife. We currently reside in Minnesota.

3. I am a sponsor for Reza Zoghi.

4. I became a sponsor for Reza Zoghi because we are friends — we had mutual friends in Iran and we started communicating on social media. Mr. Zoghi and his family were looking for a sponsor, and I knew this fact, and I offered to be their sponsor.

5. As a sponsor, I provided my personal information to the United Nations High Commissioner on Refugees in Turkey.

6. It is my understanding that Reza Zoghi was later connected with Lutheran Immigration and Refugee Service. Lutheran Immigration and Refugee Service called me and told me that they will assist Reza Zoghi once he and his family arrive in the United States, for a period of about three to six months. For example, the agency will ensure that Mr. Zoghi and his family have health insurance, social security numbers, housing, and some initial funds.

7. Resettlement agencies provide sponsors for refugees who arrive in the United States so that the refugees know someone when they arrive, and have a point of contact going forward.

8. In my role as sponsor, I will provide emotional support to Mr. Zoghi and his family. I will be there for them as they adjust to their new life here.

9. I will also be available to answer any questions that Mr. Zoghi and his family have about life in the United States. For example, I can help answer questions about their housing, or provide them with information about public transportation.

10. I have been in contact with Lutheran Immigration and Refugee Service prior to Mr. Zoghi's arrival in the United States. I am one of the few individuals authorized to receive information about Mr. Zoghi and his family from Lutheran Immigration and Refugee Service.

11. On or about July 14, 2017, I contacted Lutheran Immigration and Refugee Service to ask whether the agency had made "formal assurances" to the United States Department of

State on behalf of Mr. Zoghi. I was informed by an employee of the agency that the agency had made formal assurances on Mr. Zoghi's behalf.

12. During this phone call, Lutheran Immigration and Refugee Service also informed me that Mr. Zoghi's case was active and that, as of July 14, 2017, it had a "green light" for further processing. I also learned that Mr. Zoghi's medical exam was active until October 2017.

13. Recently, I have not received any updates from Mr. Zoghi or Lutheran Immigration and Refugee Service about Mr. Zoghi.

14. Mr. Zoghi has not yet arrived in the United States. As soon as he is scheduled to arrive, Lutheran Immigration and Refugee Service will let me know.

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

Executed this 1 day of November, 2017, in Maple Grove, Minnesota


Albofazi Kowsari