

# EXHIBIT I

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Juweiya Abdiaziz ALI; A.F.A., a minor; Reema  
Khaled DAHMAN; G.E., a minor; Ahmed  
Mohammed Ahmed ALI; E.A., a minor; on  
behalf of themselves as individuals and on  
behalf of others similarly situated,

Plaintiffs-Petitioners,

v.

Donald TRUMP, President of the United States  
of America; U.S. DEPARTMENT OF STATE;  
Tom SHANNON, Acting Secretary of State;  
U.S. DEPARTMENT OF HOMELAND  
SECURITY; John F. KELLY, Secretary of  
Homeland Security; U.S. CITIZENSHIP AND  
IMMIGRATION SERVICES; Lori  
SCIALABBA, Acting Director of USCIS;  
OFFICE OF THE DIRECTOR OF NATIONAL  
INTELLIGENCE; Michael DEMPSEY, Acting  
Director of National Intelligence,

Defendants-Respondents.

Case No.: 2:17-cv-00135-JLR

**DECLARATION OF MOHAMED BARRE  
OMAR  
IN SUPPORT OF PLAINTIFFS**

1 I, MOHAMED BARRE OMAR, declare under penalty of perjury as follows:

2 1. I am a United States citizen. I live in Tukwila, Washington. I own a small grocery store in  
3 Seattle, Washington, and I am an instructional assistant for Seattle Public Schools.

4 2. I was born in Somalia. I came to the United States as a refugee when I was 61 years old  
5 from Kenya. I became a U.S. Citizen on March 13, 2012 in Seattle, Washington.

6 3. My biological son is Ahmed Mohamed Barre. He was born on October 5, 1992 in  
7 Mombasa, Kenya. He is a citizen of Somalia by birth, because my wife and I were refugees. He  
8 and his mother moved to Ethiopia shortly after he was born. His mother died in Kenya on April  
9 20, 2012. He grew up in Addis Ababa, Ethiopia and has not left it since moving there. He has  
10 never physically been in Somalia.

11 4. I last saw Ahmed in 2012, before his mother died. She had been in Kenya, so I visited  
12 her and then went to Ethiopia to visit him. After visiting him, I decided to apply to bring him to  
13 the United States to live with me. He is my only child that does not live in the United States.

14 5. I filed my Form I-130, Petition for Alien Relative, for him on October 25, 2012. The  
15 preference classification for the case is 201 B INA Minor Child of USC. The petition was  
16 approved and transferred to the National Visa Center in 2015. My son was interviewed for an  
17 immigrant visa at the U.S. Embassy in Addis Ababa, Ethiopia on January 23, 2017 at 07:45 AM.  
18 His case was approved and his immigrant visa was issued on January 25, 2017.

19 6. Upon receipt of his immigrant visa, we had planned to have him pack up and then  
20 purchase a plane ticket to the U.S. The executive order was issued before he could buy a ticket.  
21 He has attempted to buy a ticket, but no airline will sell one to him because they do not want to  
22 take the risk that the U.S. will not allow him to immigrate despite the issuance of a valid  
23 immigrant visa.

24 7. My son has never lived in Somalia, has no experience with his country of citizenship, and  
25 does not know how to navigate the risks of living there. It is unsafe and impossible for him to  
26 live in Somalia.  
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1 8. My son cannot return to Kenya. The Kenyan government is actively refusing entry for  
2 Somali citizens and is refusing to take additional refugees. He no longer holds refugee status  
3 in Kenya.

4 9. I fear for my son's safety in Ethiopia due to the state of emergency related to protests and  
5 violence in Addis Ababa and throughout Oromia. My son has little opportunity in Ethiopia,  
6 because he is not a citizen there, and is present only at the permission of the government.

7 10. I fear that my son's immigrant visa will expire before he the travel ban in the executive  
8 order is lifted for citizens of Somalia. I would then lose his priority date of October 23, 2012,  
9 which allows him to be the immediate relative, minor child of a U.S. Citizen for visa preference  
10 purposes under the Child Status Protection Act. I would be required to file a new petition for  
11 him as the adult child of a U.S. Citizen, family-sponsored first preference category, which has a  
12 current priority date of January 1, 2011. It would most likely take over six years before he would  
13 be able to obtain a new immigrant visa to the United States, which would mean he would be over  
14 the age of 30 by the time he arrived. That delay would directly interfere with his ability to attend  
15 a school in the United States and build a career. It would have a permanent, negative impact on  
16 his earning abilities and his ability to marry and grow a family. It is not reasonable nor rational  
17 to prevent my son, who is a Somali citizen only as a result of his being born to refugee parents  
18 in Kenya, from coming to the U.S.

19 11. It is too expensive for me to travel to Ethiopia regularly. It has been nearly five years  
20 since the last time I visited Ethiopia. My son lives over 8,000 miles from me. His time zone is  
21 11 hours ahead of mine. When I go to bed, he is waking up; when he is going to bed, I am  
22 waking up. It is difficult for us to talk on the phone because of the time difference, but we try to  
23 make time for each other every week. I have to send him money to support in Ethiopia, because  
24 he does not have a job. It is an enormous financial and emotional hardship to my son, myself,  
25 and my family for him to live in Ethiopia while everyone else lives in the United States.  
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1 12. I want to bring my whole family together by having all of us live in the United States.  
2 My son is the only person left outside of the United States. I want him to be able to go to a good  
3 university, to have a career, and to be able to live the American Dream. Moments before January  
4 27, 2017, I believed that dream was a reality and that we would be reunited. Now, because of  
5 the executive order, I no longer know if that dream is possible.

6  
7 13. Please reunite my family by allowing my son to come to the United States as quickly as  
8 possible.

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10 I declare under penalty of perjury under the laws of the United States that the foregoing is  
11 true and correct to the best of my information, knowledge, belief.

12  
13 Executed on this 1st day of February, 2017, in Seattle, Washington.

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15 Mohamed Barre Omar  
16 14839 Military Rd S, #108  
17 Tukwila, WA 98168  
18 (206) 566-4338