

EXHIBIT J

Honorable James L. Robart

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,

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

**DECLARATION OF NIKOO NIKNEJAD
IN SUPPORT OF PLAINTIFFS**

Plaintiffs-Petitioners,

vs.

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.

DECLARATION OF
NIKOO NIKNEJAD
Case No. 2:17-cv-00135-JL

NORTHWEST IMMIGRANT RIGHTS PROJECT
615 Second Ave., Ste. 400
Seattle, WA 98104
206-957-8611

1 I, Nikoo Niknejad, declare under penalty of perjury as follows:

2 1. I am a lawful permanent resident. I live in Atlanta, Georgia. I am a homemaker.

3 2. I came to the United States when I was 61 years old from Iran. I became a resident on

4 September 25, 2009 through my brother's petition. That was the beginning of my journey to

5 come to the US and eventually bring my children to the US so we could start a new life.

6 3. My son, Amirbahador is a citizen of Iran. He is 34 years old and is currently in Iran.

7 4. I filed an I-130 petition for him on April 21, 2010. The petition was approved and I had

8 to wait until his priority date became current. It was a long process to wait but it finally came in

9 2015. I hired US immigration attorney, Carl Balediata, and he helped me through the process.

10 We submitted all the documents and paid fees. We followed all the rules. My son received his

11 US immigrant visa on December 19, 2016 in Abu Dhabi.

12 5. I was so happy that I also traveled to be with him so I could bring him home with me to

13 start his new life with me. I am now currently in Iran with him. We booked a flight for January

14 30, 2017 with British Airways out of Tehran, Iran to return to the United States. Upon check-in

15 we were told that only I could board the flight but that my son could not because he did not have

16 a green card. We immediately called Carl Balediata who spoke on our behalf with British

17 Airways to tell them my son's US Immigrant Visa was the same as a green card. British Airways

18 said no and told us to go home.

19 6. Carl Balediata was able to discuss our case in more detail with a British Airways regional

20 supervisor. It was arranged for us to try to depart again out of Tehran, Iran on February 2, 2017.

21 This time we were told that me and my son had to be given an okay by US Customs and Border

22 Protection from New York, USA. We arrived at the airport at 6:30am and waited 1 hr. We were

23 told that we both could not board the plane. The British Airways agent showed us an email from

24 US Customs and Border Protection that said I could not board the flight and that my son was not

25 "cleared" and that he had to go back to the US Embassy in Abu Dhabi. That is all they told us.

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7. I was again devastated. I feel helpless. Why is the country I love doing this to my son.
Carl Balediata is now working hard to try and bring my son home. I do not want to go home
without my son. I need him. I have already been separated from him for so long.

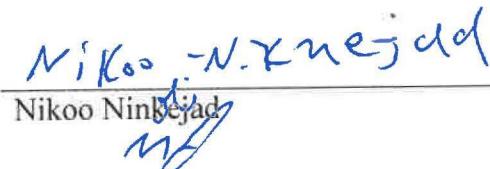
8. I am old and I want my son to be with me. I want him to start a new life in the United
States, the land of opportunity.

9. It has been a life long dream for me for my son to come and be with me in the United
States. I also filed an I-130 petition for my daughter and we were in the process of starting her
case too but now I have also lost hope with her case as well.

10. I just want my family to reunite and be with me in the United States. I always wanted
what was best for my son and my daughter. Now I cannot see how we can get through this. I am
heartbroken and cannot understand why this country I love is doing this to me and my family.

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

17 Executed on this 2nd day of February, 2017, in Tehran, Iran.

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