

# **EXHIBIT B**

Honorable James L. Robart

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

Juweiya Abdiaziz ALI; A.F.A., a minor; Re  
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 CAROL E. EDWARDS  
IN SUPPORT OF PLAINTIFFS

### 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.

## DECLARATION UNDER OATH

I, Carol L. Edward, hereby declare under penalty of perjury of the law of the State of Washington, and the laws of the United States of America, that the following is true and correct to the best of my knowledge and belief:

1. My Law Offices, the Law Offices of Carol L. Edward & Associates, P.S., are the attorneys of record for Ibado Hassan and Isahaq Ahmed Rabi. Attorney Eric Lin was involved in assisting the clients with processing the paperwork.
2. Ibado Hassan is a United States citizen and sponsored her husband Isahaq Ahmed Rabi to join her in the United States.
3. Ibado and Isahaq went through all the normal legal channels and met all the requirements for Isahaq to immigrate to the United States as a lawful permanent resident, commonly referred to as a green card holder. This includes filing paperwork with the U.S. Department of Homeland Security: United States Citizenship and Immigration Services, the National Visa Center, and the U.S. Department of State.
4. Isahaq is a Somali national and has been living in the country of Austria with a refugee application pending. He fled Somalia due to serious and life threatening problems he faced in Somalia.
5. Isahaq traveled to the U.S. with a refugee travel document issued by the country of Austria and with a validly issued immigrant visa issued by the U.S. Consulate in Vienna, Austria. He had previously been interviewed and submitted the necessary information so that background security checks could be completed prior to his visa issuance by the American Consulate.
6. Isahaq flew to the U.S. with a one-way ticket as he was planning on living in the United States permanently with his wife Ibado. He carried with him legal documents that he provided to the customs and border patrol agents at SeaTac International Airport. Isahaq was refused entrance to the United States at SeaTac Airport on Saturday, January 28, 2017.
7. The fact that Isahaq was forced to leave the United States by U.S. Customs and Border Enforcement without even an opportunity to talk to her caused Ibado great distress as she did not know what was happening. According to family members who spoke to Isahaq after he returned to Vienna, he himself was not sure whether he would be allowed to return to Vienna or would be deported back to Somalia, the country he had fled. He was also told when he was at the airport that he could not speak to his lawyer.

8. After learning that Isahaq had not been allowed to enter, I contacted CBP at the airport by telephone and was informed that they would not discuss the case with me, even though I was the attorney for Isahaq and further would not even discuss the current procedure in dealing with persons arriving from one of the seven countries that are part of President Trump's executive order.

Signed on 1/29/2017 at Concrete, Washington  
(date) (Place of signing, city, state)



Signature